- 1		
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	Telephone: (213) 683-9100	
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12	Taiwan Taipei Co. LTD	
13		
14	UNITED STATES	DISTRICT COURT
15	NORTHERN DISTRI	ICT OF CALIFORNIA
16	SAN FRANCI	SCO DIVISION
17	IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION	Master File No. 3:07-cv-05944-SC
18		MDL No. 1917
19	This Document Related to:	DECLARATION OF CATHLEEN H.
20	DIRECT PURCHASER ACTIONS	HARTGE AND EXHIBITS IN SUPPORT OF DEFENDANT LG ELECTRONICS,
21		INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON
22		WITHDRAWAL GROUNDS
23		[Notice of Motion and Motion for Partial Summary Judgment, Declaration of Duk
24		Chul Ryu and [Proposed] Order filed concurrently herewith]
25		Judge: Honorable Samuel Conti
26		Date: February 6, 2015 Time: 10:00 a.m.
27	ii .	Crtrm.: 1, 17 th Floor
28		Master File No. 3:07-cy-05944

DECLARATION OF CATHLEEN H. HARTGE AND EXHIBITS IN SUPPORT OF DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

28

2014.

1	24. Attached to this do	eclaration as Exhibit 23 is a true and correct copy of excerpts	
2	from the deposition of Young Bae Na deposed in this case on September 23, 2014.		
3	25. Attached to this de	eclaration as Exhibit 24 is a true and correct copy of deposition	
4	exhibit 7501 marked at the deposit	ion of Young Bae Na on September 23, 2014	
5	26. Attached to this do	eclaration as Exhibit 25 is a true and correct copy of a true and	
6	correct copy of is a document prod	luced in this case and Bates stamped as PHLP-CRT-018339-	
7	PHLP-CRT-018340.		
8	27. Attached to this do	eclaration as Exhibit 26 is a true and correct copy of excerpts	
9	from the deposition of Kenneth Elz	zinga deposed in this case on October 27, 2014.	
10	I declare under penalty of p	perjury under the laws of California that the foregoing is true	
11	and correct. Executed on the 7th d	lay of November, 2014 in San Francisco, California.	
12			
13			
14	DATED: November 7, 2014	MUNGER, TOLLES & OLSON LLP	
15		HOJOON HWANG WILLIAM D. TEMKO	
16		MIRIAM KIM CATHLEEN H. HARTGE	
17		LAURA K. LIN	
18			
19		By: /s/ Cathleen H. Hartge	
20		CATHLEEN H. HARTGE	
21		Attorneys for Defendants LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Taiwan	
22		Taipei Co., Ltd.	
23			
24			
25			
26			
27			
28			
		-4- Master File No. 3:07-cv-05944-SC	

EXHIBIT 1 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 1 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

NewsRoom

11/28/00 N.Y. Times W1 2000 WLNR 3211365

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November 28, 2000

Section: W

LG of Korea and Philips Set Screen-Making Venture

SUZANNE KAPNER

Royal Philips Electronics and LG Electronics form joint venture that would be world's largest maker of television and computer screens; new alliance follows deal struck in September 1999, when LG Electronics sold half its flat-display screen division to Philips; LG-Philips LCD is now world's second-largest maker of thin-film, liquid-crystal displays used for flat screens on laptop computers (M)

LONDON, Nov. 27

Royal Philips Electronics of the Netherlands and LG Electronics of South Korea said today that they would form a joint venture that would be the world's largest maker of television and computer screens. The companies also said that they were discussing a merger of mobile phone operations.

The string of new and potential alliances follows a deal struck in September 1999, when LG Electronics sold half of its flat-display screen division to Philips for \$1.6 billion. LG-Philips LCD is now the world's second-largest maker of thin-film, liquid-crystal displays used for flat screens on laptop computers.

Philips and LG will each own half of the joint venture, which will combine the companies' cathode ray tube units. The new company, which has not been named, will have headquarters in Hong Kong and be run by Philippe Combes, chief executive of Philips display components division.

With \$6 billion in annual sales, the new venture will hold 25 percent of the market for color picture tubes used in television screens and computer monitors, overtaking the market leader, the Samsung SDI Company, a subsidiary of Samsung Group. Samsung SDI has 15 percent of the global market, Mr. Geerts said.

Peter Knox, an analyst with Commerzbank Securities, called the combination a "neat fit," since it brings together Philips's leading position in large television screens with LG's strength in computer monitors. The two businesses mesh geographically as well. Philips dominates Europe and the Americas, while LG is one of the strongest players in Asia.

For Philips, the combination is expected to increase profitability. LG's margins for the business were 15 percent in 1999, or roughly three times those of Philips, Mr. Knox estimates.

LG, meanwhile, will get \$1.1 billion from the new venture to reflect the difference in value between the LG and the Philips businesses. And Philips said it was considering buying as much as \$500 million worth of LG preferred shares. LG will use the money to reduce debt -- which has soared after its merger in June with LG Information and Communications, a telecommunications-equipment maker -- and to finance the purchase of a third-generation mobile phone license in Korea.

Shares of Philips rose 1.19 euros, or 2.9 percent, to 42.89 euros (\$36). LG fell 200 won, or 1.4 percent, to 13,800 (\$11.63).

---- Index References ----

Company: LG PHILLIPS LCD (KOREA); SAMSUNG CORP; LG ELECTRONICS LTD; KONINKLIJKE PHILIPS ELECTRONICS NV

News Subject: (Joint Ventures (1JO05); Major Corporations (1MA93); Corporate Groups & Ownership (1XO09))

Industry: (I.T. (1IT96); Visual Display (1VI97); Computer Equipment (1CO77); Consumer Electronics (1CO61); Electronics (1EL16); Manufacturing (1MA74); Flat Panel Displays (1FL81))

Region: (Europe (1EU83); Western Europe (1WE41))

Language: EN

Other Indexing: (AMERICAS; COMMERZBANK SECURITIES; LCD; LG PHILIPS LCD; PHILIPS; ROYAL PHILIPS ELECTRONICS; SAMSUNG; SAMSUNG GROUP) (Geerts; Knox; LG; LG Electronics; LG Information; Peter Knox; Philippe Combes)

Company Terms: ROYAL PHILIPS ELECTRONICS; LG ELECTRONICS

Edition: Late Edition - Final

Word Count: 547

End of Document

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EXHIBIT 2 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 3 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

NewsRoom

11/28/00 Xinhua Eng. Newswire 00:00:00

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November 28, 2000

LG, Philips to Establish CRT Joint venture

SEOUL (Nov. 28) XINHUA - LG Electronics Co. and Royal Philips Electronics have agreed to set up a 50:50 cathode ray tube (CRT) joint venture in the first half of next year. Through the deal, the South Korean company Tuesday said it will be able to secure a total of 1.6 billion U.S. dollars, which will be used to reduce its debts and invested in new strategic businesses.

Philips will pay 1.1 billion dollars for a 50 percent stake in the joint venture to close the difference in valuation of their respective operations.

The alliance will create the world's largest producer of CRTs for TV and computer monitors, outstripping Samsung SDI, which provides 23 percent of global demand, said LG.

Philips is the second largest provider with a share of 13 percent and LG ranks third with 11 percent.

The new economic entity is expected to set up headquarters in Hong Kong and four local operations for manufacturing and marketing in the United States, Europe, the Chinese mainland and the rest of Asia.

Now LGE operates four overseas CRT plants while Philips has 10 plants around the world.

Last year, the two companies formed an LCD joint venture -- LG. Philips LCD.

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---- Index References ----

Company: LG ELECTRONICS LTD; KONINKLIJKE PHILIPS ELECTRONICS NV

News Subject: (Joint Ventures (1JO05); Major Corporations (1MA93); Corporate Groups & Ownership (1XO09))

Industry: (Consumer Electronics (1CO61); Electronics (1EL16); Manufacturing (1MA74))

Region: (South Korea (1SO65); USA (1US73); Americas (1AM92); North America (1NO39); Asia (1AS61); Eastern Asia

(1EA61))

Language: EN

Other Indexing: (CRT; LG; LG ELECTRONICS CO; LGE; ROYAL PHILIPS ELECTRONICS; SDI)

Word Count: 239

End of Document

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EXHIBIT 3 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 3 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

NewsRoom

11/28/00 Xinhua Eng. Newswire 00:00:00

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November 28, 2000

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-0-

---- Index References ----

Company: LG ELECTRONICS LTD; KONINKLIJKE PHILIPS ELECTRONICS NV

News Subject: (Joint Ventures (1JO05); Major Corporations (1MA93); Corporate Groups & Ownership (1XO09))

Industry: (Consumer Electronics (1CO61); Electronics (1EL16); Manufacturing (1MA74))

Region: (South Korea (1SO65); USA (1US73); Americas (1AM92); North America (1NO39); Asia (1AS61); Eastern Asia

(1EA61))

Language: EN

Other Indexing: (CRT; LG; LG ELECTRONICS CO; LGE; ROYAL PHILIPS ELECTRONICS; SDI)

Word Count: 239

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EXHIBIT 4 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 4 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

NewsRoom

11/27/00 Reuters News 00:57:58

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November 27, 2000

LG Elec says Philips deal almost done.

SEOUL, Nov 27 (Reuters) - LG Electronics, a South Korean home appliance maker, said on Monday the final touches were being put on a deal with Philips Electronics NV of Netherlands.

"Negotiations are still going on, but the talks are in the final stage," an LG spokesman said. He declined to elaborate.

A spokesman from Philips Electronics Korea said the company might make an announcement on Monday, but he would not confirm the announcement would involve LG.

The Maeil Business Newspaper reported on Monday that LG Electronics would set up a joint venture with Philips for cathode ray tube (CRT) business.

Philips would invest \$1.6 billion to take most of shares of the joint venture, which would start with LG's CRT business, it said.

Philips would pay \$400 million to LG within this year, which would be used for improving its financial status, and invest the rest in the first half of next year, when the joint venture would officially inaugurate, the newspaper said.

LG and Philips would manage the joint venture together, it said.

LG Electronics shares were down 50 won (\$0.421) to 13,950 at 0055 GMT.

LG Electronics set up a TFT-LCD joint venture with Philips last year.

(\$=1187.0 won).

---- Index References ----

Company: PHILIPS ELECTRONICS (UK) LTD; LIMITED LIABILITY COMPANY "PHILIPS"; PHILIPS ELECTRONICS CHINA BV; KONINKLIJKE PHILIPS ELECTRONICS NV; LG ELECTRONICS; PHILIPS ELECTRONICS TECHNOLOGY SHANGHAI HOLDING BV; LG CORP; PHILIPS MEDICAL REFURBISHED SYSTEMS BV; PHILIPS ELECTRONICS SINGAPORE PTE LTD; LG ELECTRONICS LTD; PHILIPS AB; PHILIPS ELECTRONICS INDIA LTD; PHILIPS ELECTRONICS REALTY CORP; PHILIPS AG; PHILIPS ELECTRONICS (ISRAEL) LTD; PHILIPS ELECTRONICS REPRESENTATIVE OFFICES BV; PHILIPS ELECTRONICS MIDDLE EAST AND AFRICA BV; LEAGUE ALLOY CO LTD; PHILIPS SPA (PHILIPS ELECTRONIC NV); PHILIPS ELECTRONICS LTD; PHILIPS ELECTRONICS KOREA LTD; LIBERTAS CAPITAL (DUBAI) LTD; LCD;

KONINKLIJKE PHILIPS; PHILIPS DANMARK AS; LAFARGE SA ADR; GUANGXI LIUGONG MACHINERY CO LTD; PHILIPS ELECTRONICS AUSTRALIA LTD; PHILIPS ELECTRONICS JAPAN LTD; PHILIPS ROMANIA SRL

News Subject: (Joint Ventures (1JO05); Major Corporations (1MA93); Corporate Events (1CR05); Business Management (1BU42))

Industry: (Electronics (1EL16); Consumer Electronics (1CO61); Consumer Products & Services (1CO62))

Region: (South Korea (1SO65); Far East (1FA27); Eastern Asia (1EA61); Asia (1AS61))

Language: EN

Other Indexing: (ELECTRONICS KOREA; LCD; LG; LG ELEC; LG ELECTRONICS; MAEIL BUSINESS NEWSPAPER; PHILIPS; PHILIPS ELECTRONICS) (Philips)

Word Count: 200

End of Document

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EXHIBIT 5 TO CATHLEEN H. HARTGE
DECLARATION IN SUPPORT OF DEFENDANT LG
ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION
FOR PARTIAL SUMMARY JUDGMENT ON
WITHDRAWAL GROUNDS

EXHIBIT 5 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS







Nov 28,2000

JoongAng Ilbo spoke Tuesday with the vice chairman and CEO of LG Electronics, John Koo. LG signed an agreement Monday with Royal Philips Electronics to merge their cathode ray tube businesses into a new company.

JAI: LG Electronics has entered into another partnership with Philips in addition to the currently operating joint venture that makes liquid crystal displays. Why did you select Philips again as your partner?

Koo: We have trust in Philips, since the first partnership has posted satisfactory revenues. We foresee that this new joint venture, for cathode ray tubes, will become a leader in the global market.

JAI: Do you have anything to say about your relationship with Philips a year after establishing the liquid crystal display partnership?

Koo: I realized that it was impossible to take the world's top position without a partnership with another company in these times of unlimited competition.

JAI: Some industry watchers expect that LG's display unit business will be shrunk by the spin-off of its cathode ray tube business.

Koo: We do not expect any big problems, as cathode ray tubes are components of monitors. The new company will develop technologies and new products which the parents will use in their TVs and monitors. The joint venture will provide more value for the parent companies.

JAI: Nomura Securities pointed out that LG's attraction of foreign capital resulting from the partnership is not enough to settle its short-term liquidity problems.

Koo: We will receive a \$1.1 billion payment from the new company during the first half of 2001. We will issue redeemable preferred shares to lower our debt ratio to below 200 percent by the end of this year. If Philips purchases \$500 million worth of the issues, our liquidity problems will be completely solved. We have already secured sufficient capital for investment in digital and telecommunication equipment projects.

JAI: Despite the attraction of foreign capital, LG Electronics' shares have been on a downward course recently.

Koo: If investors would look at our additional efforts to lower the company's debt ratio, they would change their attitudes. We will soon sell off our stakes in non-electronics affiliates. I would ask investors to consider our company's future value.

JAI: Some market observers are pessimistic about the new partnership. They say that LG electronics will remain as a simple manufacturer of refrigerators and washing machines because you have shed your major high-tech business segments.



구독신청 | 샘플신청 | PDF | 모바일

Koo: The cathode ray tube business is no longer our major high-tech business. We will build on our reputation as the "digital leader," focusing on digital projects and nextgeneration telecommunications projects. The profitability of the company will be boosted by the partnership. We will prove it sooner or later.

JAI: But LG Electronics' annual sales are expected to drop next year after the spin-off of the cathode ray tube business.

Koo: Sales figures next year will not be much changed from this year. We have projected 2001 at 16.4 trillion won (\$13.8 billion), up from 13.6 trillion won this year. Profits will also increase.

by Sunny Yang

- ▶ "당뇨" 딴거하지말고, "이것"만 해라!
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- ▶ 짝 출신 "30억" 재벌男, 알고보니..충격!
- ▶ 김오곤日 "비만여성" ㅇㅇ모르면 살못빼?!





J-Hot Click

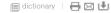
- · Residents block launch of leaflets
- Arrival of iPhone 6 will change phone market
- 4 Jobs for humanities majors pull a vanishing act
- Reps vow help for sex slaves
- · North can fit nuke on missile: USFK commander
- · United States a 'logical ally' for Korea, Stratfor's
- * FSS to investigate lenders
- * SC Korea to open new head office
- 4 3-D printers in the operating room
- · Kaist researcher elected as next director of ITU
- 항암효과 있는 약초 "와송" 화제된 이유?!
- 남성수술은 퍼스트비뇨기과 김재영원장
- · 서민 대출지원 "최대 5000만원" 가능
- 방송인도 놀란"주식프로그램" 대체뭐길래?
- 전X현 부분모델 화끈한 몸매비결!!
- 30.40代부부관계 관심사 "한번더"?
- "2개 이상 임플란트 해야한다면?"
- 고추 만지는 내아이..알아보니? "틱장애"
- 김오곤터비만여성 살찌는 이유? 이것몰라서..
- 부부들의 제 2의 신혼 "이것" 알고보니..



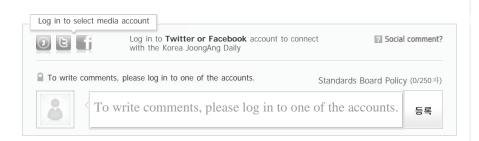
















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Bilingual Column

Government must not feign innocence **◆** FOUNTAIN

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실시간 인기정보

- 김오곤" 비만여성 운동없이 살뺄수있다?!
- 김오곤터비만여성 "이것"만 해도살빠져?!
- 먹어도 살 안찌는 여성, 이유 알고보니..
- 가을철.라식,라섹 할때 "꼭" 이것만 알아두…
- "당뇨원인" 해결한 한국인, 세계가 놀랐다..
- ▶서민대출 지원 "최대5000만원까지"
- 남성수술은 퍼스트비뇨기과 김재영원장
- 서민대출 지원 "최대5000만원까지!"
- 대명"파격할인분양" 보증금 100%만기 환급!



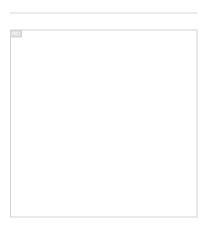


① 신데를 Editorials

more 3

Time for realism

Court's strange logic ● EDITORIAL







INSIDE K-Wave

JYJ to perform on Japan tour

K-pop trio JYJ successfully finishe d their Asia tour last month. ...



Park Hae-jin makes

Korean actor Park Hae-jin donated 100 million won (\$94,047)...



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National	Business	Opinion	Culture
2 Execu	tion asked f	unch of leaf or Sewol cap es majors pu	tain
_		overhaul of	public pe
_ '	vow help for	sex slaves planned for	
		e on missile:	
8 United	d States a 'lo	ogical ally' fo	r Korea,

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(1) KOREA JOONGANG DAILY

[Policy on the use of contents]

EXHIBIT 6 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 6 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

	ORIGINAL	Page 1
1	UNITED STATES DISTR	TCT COURT
2	NORTHERN DISTRICT OF (
3	NORTHERN DIDIRICI OF	CALIFORNIA
4	IN RE: CATHODE RAY TUBE	
-	(CRT) ANTITRUST LITIGATION	
5	, , , , , , , , , , , , , , , , , , , ,	No. 307-5944 SC
		MDL No. 1917
6	This Document Relates to:	

7	ALL ACTIONS	HIGHLY CONFIDENTIAL
·		
8		
	SUPERIOR COURT OF THE STATE	TE OF CALIFORNIA
9		
	CITY AND COUNTY OF SAM	N FRANCISCO
10		
		·
11		
	STATE OF CALIFORNIA, et al.,	
12		
	Plaintiffs,	Ì
13	v. .	No. CGC-11-51584
		[Related to
14	SAMSUNG SDI, INC., CO.,	CGC-11-515786]
	LTD., et al.	
15	·	
	Defendants.	
16		
17		
18	VIDEOTAPED DEPOSITION OF	DUK CHUL RYU
19	San Francisco, Cai	lifornia
20	Wednesday, January	15, 2014
21	Volume I	·
22		
	Reported by:	
23	SUZANNE F. BOSCHETTI	
	CSR No. 5111	
24		
25		
-		

Case 4:07-cv-05944-JST Document 3043-1 Filed 11/07/14 Page 31 of 125

HIGHLY CONFIDENTIAL

			Page 22	
The section	1	Q Mr. Ryu, you started working at LG in April	09:32:52	
	2	of 1994; is that correct?	09:32:56	
	3	A No.	09:33:05	
	4	When did you start working for LG?	09:33:08	
	5	A It was from December of 1993.	09:33:16	
	6	Q And was it called Lucky was LG called	09:33:24	
	7	Lucky Goldstar at that time?	09:33:27	
	8	A It was Goldstar.	09:33:39	
	9	And it changed to LG Electronics sometime	09:33:40	
	10	in 1995; is that correct?	09:33:45	
	11	That I'm not too sure.	09:33:56	
	12	Q What was your title when you first joined	09:33:58	,
V-1-V	13	LG or Goldstar?	09:34:01	
	14	A I was an associate.	09:34:09	5
	15	And what group were you in at that time?	09:34:13	
	16	THE INTERPRETER: Clarification.	09:34:34	
	17	THE WITNESS: I belonged to the Planning	09:34:40	
	18	and Management Department in CRT Business Division	09:34:46	
	19	located in Gumi	09:34:52	
	20	THE INTERPRETER: G-u-m-i.	09:34:54	
	21	BY MS. WHITEHEAD:	09:35:01	
	22	Q So you had responsibilities related to	09:35:02	
	23	cathode ray tubes at that time; is that correct?	09:35:04	
	24	A Yes.	09:35:17	
Ž	25	Q And cathode ray tubes are also called CRTs,	09:35:17	

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		Page 23	
1	right?	09:35:21	
2	A Yes, that's correct.	09:35:26	
3	And you understand that a color display	09:35:27	
4	<pre>tube is a type of CRT; is that right?</pre>	09:35:29	
5	A It is a CRT for monitors.	09:35:44	
6	Q For computer monitors?	09:35:47	
7	A Correct.	09:35:51	
8	Q And it's also referred to as a CDT?	09:35:52	
9	A Yes, that's correct.	09:35:59	
10	Q Were there any other uses for CDTs besides	09:36:01	
11	computer monitors?	09:36:05	
12	A To my understanding, it is also used for	09:36:19	
13	medical equipment.	09:36:22	
14	Q And that would be for the displays for	09:36:26	
15	medical equipment; is that right?	09:36:29	
16	A That's correct.	09:36:33	
17	Q Do you understand that a color picture tube	09:36:36	
18	is also a type of CRT?	09:36:38	
19	A Yes.	09:36:46	
20	Q It's also referred to as a CPT?	09:36:47	
21	A Yes, that's correct.	09:36:54	
22	And CPTs were used in televisions, correct?	09:36:54	
23	Yes, that's correct.	09:37:01	
24	Q Were there any other uses for CPTs besides	09:37:02	
25	televisions?	09:37:05	

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			Page 24
1	A	I don't believe I heard of any other uses.	09:37:15
2	Q	How long were you an associate in the	09:37:23
3	Planning	and Management Group at Gumi when you	09:37:26
4	started	in '93?	09:37:30
5	A	I think I was an associate for four to five	09:37:49
6	years.		09:37:53
7	Q	What were your job responsibilities as an	09:37:58
8	associat	e in the Planning and Management Group at	09:38:02
9	the Gumi	factory?	09:38:05
10	A	I analyzed costs for the CRTs that were	09:38:23
11	manufact	ured by Goldstar.	09:38:28
12	Q	What types of costs did you analyze?	09:38:38
13	A	The such costs as the material cost, the	09:39:06
14	labor co	st, other expenses, sales management cost	09:39:10
15	and gene	ral management costs were managed.	09:39:15
16	Q	Did you issue any reports about the costs	09:39:26
17	for CRTs	during that time?	09:39:30
18	A	Yes.	09:39:44
19	Q	What types of reports did you issue?	09:39:44
20	A	I reported the analysis result of the costs	09:40:03
21	by sizes	of CDTs and CPTs.	09:40:09
22	Q	How frequently did you issue these reports?	09:40:20
23	A	I issued reports quarterly.	09:40:37
24	Q	And who did you issue the reports to?	09:40:41
25	A	I made a report to the team leader.	09:40:52

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1	I, the undersigned, a Certified Shorthand
2	Reporter of the State of California, do hereby
3	certify:
4	That the foregoing proceedings were taken
5	before me at the time and place herein set forth;
6	that any witnesses in the foregoing proceedings,
7	prior to testifying, were duly sworn; that a record
8	of the proceedings was made by me using machine
9	shorthand which was thereafter transcribed under my
10	direction; that the foregoing transcript is a true
11	record of the testimony given.
12	I further, certify I am neither financially
13	interested in the action nor a relative or employee
14	of any attorney or party to this action.
15	IN WITNESS WHEREOF, I have this date
16	subscribed my name.
17	Dated: January 24, 2014
18	
19	
20	
21	Surgery of Brochette
22	SUZANNE F. BOSCHETTI
23	CSR No. 5111
24	

25

Attached to the deposition of DUK CHUL RYU, Volume I (January 15, 2014)

ERRATA SHEET

Page	Line	Change
22	14	Change "receive" to "received"
24	13	Delete "the" before "such"
25	4	Change "where" to "were"
27	14	Delete "in"
27	15	Change "lines" to "line"
33	9	Change "teams" to "team"
34	19	Change "sizes" to "size"
43	17	Change "a" to "the"
43	19	Change "at that" to "on the"
43	20	Change "sizes were" to "size was"
44	3	Change "have" to "had"
44	8	Change "demand" to "demands"
44	20	Change "in" to "on"
60	18	Change "was" to "were"
68	3	Change "Export" to "Domestic"
68	8	Change "Export" to "Domestic"
68	14	Change "Export" to "Domestic"
80	18	Change "Teco" to "Beko"
86	8	Change "Teco" to "Beko"
98	4	Change "was" to "were"
101	16	Change "was" to "were"
103	18	Change "cost" to "cause"
110	19	Change "inventory" to "demand"
128	17	Should be: "There were people who worked in"
140	12	Change "how many" to "what"

HIGHLY CONFIDENTIAL

	Page 158
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7	
8	I, DUK CHUL RYU, do hereby declare under
9	penalty of perjury that I have read the foregoing
10	transcript of my deposition; that I have made such
11	corrections as noted herein, in ink, initialed by
12	me, or attached hereto; that my testimony as
13	contained herein, as corrected, is true and correct.
14	EXECUTED this, day of,
15	2014, at <u>Seoul</u> , <u>South Korea</u> .
16	(City) (State)
17	14
18	
	DUK CHUL RYU
19	Volume I
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EXHIBIT 7 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 7 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

	ORIGINAL Page 160
1 2 3	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA
4) IN RE: CATHODE RAY TUBE) (CRT) ANTITRUST LITIGATION) No. 307-5944 SC
6) MDL No. 1917 This Document Relates to:) HIGHLY CONFIDENTIAL
7 8	ALL ACTIONS)
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA
10	CITY AND COUNTY OF SAN FRANCISCO
11	STATE OF CALIFORNIA, et al.,)
12) Plaintiffs,)
13	v.) No. CGC-11-51584) [Related to
14	SAMSUNG SDI, INC., CO.,) CGC-11-515786] LTD., et al.
15	Defendants.)
16)
17 18	VIDEOTAPED DEPOSITION OF DUK CHUL RYU
19	San Francisco, California
20	Thursday, January 16, 2014
21	Volume II
22	
	Reported by:
23	SUZANNE F. BOSCHETTI CSR No. 5111
24	
25	

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		• 1
	. Pi	age 239
1	else and did it.	01:49:18
2	Q So when when an employee of LGE	01:49:20
3	communicated with one of its suppliers that it would	01:49:26
4	purchase, you know, a particular volume of tubes,	01:49:28
5	was it guaranteeing that it would purchase that	01:49:31
6	number of tubes?	01:49:33
7	MR. TEMKO: Vague and ambiguous.	01:49:59
8	Incomplete hypothetical. Calls for a legal	01:50:01
9	conclusion.	01:50:07
10	THE WITNESS: We did not guarantee.	01:50:10
11	BY MS. WHITEHEAD:	01:50:13
12	Q Were there times when LGE purchased fewer	01:50:13
13	tubes than it had told a supplier it intended to	01:50:16
14	purchase?	01:50:21
15	A Yes, there were.	01:50:35
16	Q In what situations would that happen?	01:50:36
17	A There were cases where the total number of	01:51:03
18	TV monitor production volume was decreased from the	01:51:09
19	number that we had planned at the LG Electronics.	01:51:19
20	Q And were there ever any other reasons that	01:51:24
21	LGE would purchase fewer tubes than it had told a	01:51:26
22	supplier it would purchase?	01:51:31
23	A In case their price competitiveness was	01:52:07
24	worse than the other supplier, because we sometimes	01:52:12
25	gave more volume to the other company that had	01:52:18

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· 		age 240
1	better price competitiveness, in that case, certain	01:52:23
2	supplier's volume got decreased.	01:52:29
3	Q Were there any other reasons that LGE would	01:52:34
4	purchase fewer tubes than it had told a supplier it	01:52:36
5	would purchase?	01:52:40
6	A Because you limited your question up to	01:53:13
7	2010, there was another reason. For example, there	01:53:15
8	were cases where a certain supplier reduced their	01:53:22
9	CRT business that in some cases a company would	01:53:27
10	completely give up the CRT business all together	01:53:37
11	that we had to reduce the volume of the CRTs that we	01:53:43
12	purchased than the plan.	01:53:49
13	Q And are there any other reasons you can	01:53:57
14	think of?	01:53:59
15	A No.	01:54:06
16	Q When you were in procurement at LGE, LGE	01:54:10
17	was a an owner of LPD, correct?	01:54:15
18	MR. TEMKO: Object. No foundation. Calls	01:54:31
19	for a legal conclusion. And vague as to time.	01:54:36
20	THE WITNESS: I knew it was a joint	01:54:53
21	venture, but I did not have a precise understanding	01:54:59
22	as to the relationship with LG Electronics.	01:55:03
23	BY MS. WHITEHEAD:	01:55:07
24	Q Did LGE procure tubes from LPD differently	01:55:07
25	from the way it procured tubes from other CRT	01:55:12

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			Page 241
1	supplier	s <mark>:s?</mark>	01:55:16
2	(A)	No.	01:55:26
3	Q	Who were LGE's CRT computer monitor	01:55:37
4	customer	es during the time you were in procurement a	t 01:55:42
5	LGE?		01:55:45
6		MR. TEMKO: Object. No foundation.	01:56:01
7		THE WITNESS: LG Electronics had its own	01:56:25
8	brand, a	and I believe it supplied to such companies	01:56:29
9	as Sony	or other companies which did OEM method.	01:56:37
10	BY MS. W	HITEHEAD:	01:56:45
11	Q	Can you think of any other companies who	01:56:46
12	used the	OEM method that LGE supplied computer	01:56:50
13	monitors	to?	01:56:54
14	A	I remember Apple.	01:57:09
15	Q	Any others?	01:57:11
16	A	I don't recall any more because I wasn't	01:57:19
17	directly	involved in the sales.	01:57:21
18	Q	Do you know whether LGE supplied computer	01:57:27
19	monitors	to Dell?	01:57:30
20	A	That I don't know.	01:57:38
21	Q	Do you know whether LGE strike that.	01:57:41
22		During the time you were in procurement at	01:57:47
23	LGE, who	were the TV customers of LGE?	01:57:51
24		MR. TEMKO: Just out of curiosity, do you	01:58:07
25	mean CRT	televisions?	01:58:10

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		Page 284
1	MR. TEMKO: Yes, please.	04:47:11
2	BY MS. WHITEHEAD:	04:47:16
3	Q Were you curious why LPD had information	04:47:16
4	about the price increase plans of its competitors?	04:47:20
5	MS. SOLOUKI: Same objection.	04:47:35
6	THE WITNESS: This is what I thought:	04:48:09
7	There was no way to verify whether the LPD's	04:48:18
8	information they were telling me about the	04:48:25
9	competitors' price increase was correct or not. So	04:48:27
10	I thought it was one of the LPD's sales strategy or	04:48:42
11	a way to persuade me of their price increase notice,	04:48:50
12	that they could have been using this as false	04:48:56
13	information.	04:49:11
14	One thing I want to add is that it pertains	04:49:55
15	to my personal position, but because I was working	04:50:01
16	in the procurement of monitor CDT and TV CPT and the	04:50:11
17	LCD module at the same time, that relating to the	04:50:23
18	CRT portion, I was making every effort to lower the	04:50:29
19	cost in terms of the CDT monitors and CPT TVs.	04:50:42
20	In addition to it, if you look at the first	04:51:45
21	email, the date of the first email is October 25th.	04:51:47
22	And later on, Mr. Ahn makes another request, again	04:51:52
23	on January 13th. So that means	04:51:58
24	MS. WHITEHEAD: November.	04:52:04

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_		nighti confidential		
		1	Page 285	
)	1	THE WITNESS: So that means during that	04:52:16	
	2	20 days, I had been making a lot of effort in order	04:52:20	
	3	to lower the prices or to respond to the price	04:52:30	
	4	increase with my own purchasing strategy, even	04:52:37	
	5	utilizing the Business Planning Team, not only the	04:52:46	
	6	Purchasing Team, that I was making every effort to	04:52:58	-
	7	lower the CRT prices. So I think you can verify	04:53:04	
	8	that reading these chain of emails.	04:53:09	
_	9	BY MS. WHITEHEAD:	04:53:21	
	10	Q Do you recall whether LPD was ultimately	04:53:21	
	11	successful in getting this price increase that it	04:53:24	
	12	requested in October of 2007?	04:53:30	
)	13	A I don't recall that exactly.	04:53:48	
	14	Q But according to the email on	04:53:50	
	15	November 13th, 2007, LPD still insisted on a price	04:53:53	
	16	increase, correct?	04:53:58	
	17	MR. TEMKO: Mischaracterizes the document.	04:54:07	
	18	THE WITNESS: Yes, that's right. That's	04:54:22	
	19	why the first email was written by the I believe	04:54:24	
	20	a manager at the LPD's Sales Team, but the last	04:55:08	
	21	email was from the I believe he was the sales	04:55:15	
	22	director of LPD, and I think that shows how fierce	04:55:22	
	23	the price negotiation was.	04:55:29	
	24	BY MS. WHITEHEAD:	04:55:29	
	25	Q Mr. Ryu, as an employee in purchasing for	04:55:37	
				1

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	Р	age 286	
1	CRTs, did you want your suppliers to discuss prices	04:55:40	
2	with their competitors?	04:55:44	
3	A Not at all.	04:56:11	
4	Q So when you received emails like the one	04:56:12	
5	here in which your suppliers provided information	04:56:14	
6	regarding the price increases of their competitors,	04:56:19	
7	why didn't you ask them how they got that	04:56:23	
8	information?	04:56:25	
9	A By "competitors," do you mean SDI and CPT?	04:56:51	
10	Q Yes.	04:56:56	
11	A As I said earlier, that was because I did	04:57:23	
12	not have sufficient time to pay attention to those	04:57:35	
13	things, because I had too many things to take care	04:57:39	
14	of that I could not pay attention to it.	04:57:42	
15	Also, I wasn't interested in whether the	04:58:06	
16	CPT was raising its prices or SDI was raising its	04:58:09	
17	prices. My foremost interest was to lower the CDT	04:58:15	
18	prices that we were purchasing from LPD.	04:58:22	,
19	So if you look in the middle of the email,	04:58:40	
20	it says: "No profit, no business." This is the	04:58:43	
21	phrase I used in order to pressure LPD so that I	04:58:45	
22	could lower the prices.	04:58:56	
23	Q Mr. Ryu, if you did not want your suppliers	04:59:00	
24	to discuss prices with their competitors, why didn't	04:59:05	
25	you ask Mr. Jin Mun Choi how he got the information	04:59:10	

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I, the undersigned, a Certified Shorthand 1 Reporter of the State of California, do hereby 2 3 certify: 4 That the foregoing proceedings were taken before me at the time and place herein set forth; 5 that any witnesses in the foregoing proceedings, 6 prior to testifying, were duly sworn; that a record 8 of the proceedings was made by me using machine 9 shorthand which was thereafter transcribed under my 10 direction; that the foregoing transcript is a true 11 record of the testimony given. I further, certify I am neither financially 12 13 interested in the action nor a relative or employee of any attorney or party to this action. 14 15 IN WITNESS WHEREOF, I have this date 16 subscribed my name. 17 18 Dated: January 29, 2014. 19 20 21 SUZANNE F. BOSCHETTI 22 23 CSR No. 5111 24

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HIGHLY CONFIDENTIAL

	Page 292
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8	I, DUK CHUL RYU, do hereby declare under
9	penalty of perjury that I have read the foregoing
10	transcript of my deposition; that I have made such
11	corrections as noted herein, in ink, initialed by
12	me, or attached hereto; that my testimony as
13	contained herein, as corrected, is true and correct.
14	EXECUTED this day of,
15	executed this, day of,
16	(City) (State)
17	
18	
	DUK CHUL RYU
19	Volume II
20	
21	
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SEALED EXHIBIT 8 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS - Filed Under Seal EXHIBIT 9 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 9 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

1 2 3 4 5	BAKER BOTTS L.L.P. Jon V. Swenson (SBN 233054) 1001 Page Mill Road Building One, Suite 200 Palo Alto, CA 94304-1007 Telephone: (650) 739-7500 Faesiinile: (650) 739-7699 Email: jon.swenson@bakerbotts.com BAKER BOTTS L.L.P.	
6 7 8 9 10 11	John M. Taladay (pro hac vice) Joseph Ostoyich (pro hac vice) Erik T. Koons (pro hac vice) Charles M. Malaise (pro hac vice) 1299 Pennsylvania Avenue, N.W. Washington, D.C. 20004-2400 Tclephone: (202) 639-7700 Facsimile: (202) 639-7890 Email: john.taladay@bakerbotts.com Email: joseph.ostoyich@bakerbotts.com Email: erik.koons@bakerbotts.com Email: charles.malaise@bakerbotts.com	
13	Attorneys for Defendant Koninklijke Philips N.V. Philips Electronics North America Corporation	, and
14 15 16	NORTHERN DIS	TES DISTRICT COURT STRICT OF CALIFORNIA NCISCO DIVISION
17 18 19 20 21 22 23 24 25 26 27 28	In re: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION This Document Relates to: ALL ACTIONS	Case No. 07-5944 SC MDL No. 1917 DECLARATION OF FRANCISCUS JOHANNES SPAARGAREN 400 EXHIBIT NO. WU 7 - - Y S. LANCASTER
	Active 15226772.1 DECLARATION OF FRANCE	MDL 1917 SCUS JOHANNES SPAARGAREN

- I, Franciscus Johannes Spaargaren, being duly sworn, hereby declare and state as follows:
- 1. The statements contained in this declaration are based on my personal knowledge, my review of the books and records of Koninklijke Philips N.V. ("KPNV"), and my consultation with various employees of KPNV, as well as KPNV's subsidiaries, joint ventures, and associates (collectively "Philips"). If called upon, I could and would competently testify to these statements under oath.
- 2. Unless otherwise specified, the statements below relate to May 1998 to June 2004—the time period during which I was employed by Philips.

I. Professional Background

- 3. I received a bachelor's degree in economics from Utrecht University in 1978.
- 4. I received an executive masters of business administration from Henley Management College in the United Kingdom in 1993.
- 5. I am currently retired and live in Oisterwijk, in the Netherlands. I was employed by Philips from May 1998 to June 2004.
- 6. Prior to joining Philips, I served in the internal audit department for Bruna, a Dutch company with approximately 400 bookstores in the Netherlands; served as an assistant controller for Baars Cheese; and served in various corporate capacities for Varta, a German battery manufacturer.
- 7. Since leaving Philips, I have served as the CFO for multiple companies including GemPlus, OTB, Cofely, and Tommy Hilfiger.

II. Employment at Philips

- 8. Philips Display Components ("Philips Components") is a business group within Philips that manufactured and sold components for consumer electronics including cathode ray tubes ("CRTs") for televisions and computer monitors. The Philips Components business group was part of the Product Division Components, at that time one of the six Product Divisions of Philips.
- 9. I joined Philips Components as CFO in May 1998. My official title was executive vice-president and CFO of Philips Components. I worked for Philips Components from May 1998

 Active 15226772.3 2 MDL 1917

 to November 2001.

- During my time at Philips Components, I reported directly to Philips Components' CEO: Mr. Y.C. Lo (May 1998 to January 1999), Mr. Gerard Kleisterlee (January 1999 to August 2000), and Mr. Matt Medeiros (August 2000 to November 2001).
- 11. In July 2001, KPNV and LG Electronics, Inc. ("LG") created a joint venture for the manufacture and sale of CRTs known as LG. Philips Displays ("LPD").
- 12. Philips' Joint Venture Office ("JV Office") was created in November 2001 to oversee KPNV's investment in multiple joint ventures including LPD. I was the head of this office from November 2001 until I left Philips in June 2004. My title was executive vice-president of Philips International. I was the sole employee of the JV Office.
- 13. In this position, I first reported to Mr. Arthur Van der Poel, a member of KPNV's board of management. I later reported to Mr. Jan Oosterveld, head of corporate strategy, and finally Mr. Ad Huijser, KPNV's chief technology officer.
 - 14. I was never employed by LPD and never received any compensation from LPD.

III. The Formation of LPD

- 15. LPD was officially created in July 2001, as a joint venture between KPNV and LG. The joint venture was governed by a Joint Venture Agreement ("JV Agreement") that was signed by KPNV and LG on June 11, 2001.
 - 16. KPNV and LG had begun discussing this potential joint venture in late 1999.
- 17. I was personally involved in the negotiations surrounding the drafting of the Letter of Intent between the joint venture parties in early 2000, which set out key terms of the joint venture.
- 18. As part of these discussions, I was personally involved in working with LG on the valuation of the assets that both shareholders would contribute to LPD and to develop the high-level structure for LPD's governance that LPD's management would implement once LPD became operative.

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As part of being a wholly separate and fully-operational company, the financial and

MDL 1917

business affairs of LPD's operational headquarters were run by LPD's Group Management Team/Executive Board, individually and jointly. The operations of LPD's subsidiaries were likewise run by the management of those subsidiaries.

- 39. At no time did KPNV, or any other Philips entity, or LG ever exert any day-to-day management or control over LPD.
- 40. Based on the JV Agreement, both shareholders held approximately 50% of LPD's shares and thus neither could unilaterally make decisions at LPD's general meeting of shareholders, as a two-thirds majority was required to pass shareholder decisions.

A. LPD's Supervisory Board

- 41. The role of the Supervisory Board was to provide high-level strategic advice to LPD's management and aide LPD in determining its business policies and how to implement those policies. This implementation, however, was solely the responsibility of LPD's management.
- 42. The Supervisory Board never made decisions on behalf of LPD; it only approved major decisions planned by LPD's management such as LPD's strategic plans related to investments and restructuring. Further, I do not remember a single instance in which the Supervisory Board vetoed any investments or plans that LPD submitted to the Supervisory Board.
- 43. The Supervisory Board did not run or control the day-to-day operations of LPD.

 LPD's management had independent autonomy to control LPD's business. The Supervisory Board did not have management responsibilities over the price that LPD charged for CRTs, or the volume of CRTs that LPD produced, or the customers that LPD sold to.
- 44. This structure of a supervisory board giving strategic guidance and a management team that controls the day-to-day operations of a company is typical in the Netherlands.
- 45. The members of the Supervisory Board had a fiduciary duty to LPD. As a member of the Supervisory Board, I took this fiduciary obligation seriously and, in this capacity, never acted in any way contrary to LPD's interests. KPNV never instructed me as a Supervisory Board member to direct LPD on how to run its day-to-day operations.

Active 15226772.3 6 MDL 1917

- B. Philips' Joint Venture Office
- 46. The Philips JV Office was the liaison between Philips and LPD.
- 47. My primary responsibility as head of this office was to keep KPNV informed on the status of its joint ventures, including its investment in LPD. In order to fulfill this responsibility, I analyzed information that the Supervisory Board received from LPD about its operational performance.
- 48. As the only member of the JV Office, I did not manage the day-to-day operations or strategic direction of LPD in any way, nor did I control KPNV's representatives on the Supervisory Board.
- 49. The JV Office did not have any control over the agenda for the Supervisory Board meetings, nor did the JV Office advise LPD on business plans or investments.

VI. KPNV and LG Sought to Ensure LPD's Financial Success

- 50. KPNV and LG always sought to assist LPD in becoming a financially self-sufficient company.
- 51. During LPD's first year, a confluence of market factors—including the dotcom bubble bursting and the tragedy of September 11, 2001—resulted in poor performance across the entire consumer electronics industry, including LPD.
- 52. In response to this performance, upon LPD's request, KPNV and LG worked with the syndicate of private lenders to agree on a capital injection. Thus, in May 2002, KPNV and LG agreed to make a capital injection of \$250 million into LPD. KPNV later made additional capital injections and provided certain guarantees if further injections were necessary. KPNV believed that LPD would be able to use these funds to restructure and continue to be financially self-sufficient.
- 53. KPNV never insisted on receiving any income as a shareholder of LPD and never received a return on its investment.
- 54. KPNV never removed assets from LPD. Nor did it ever withdraw or seek the return of its equity investments in LPD, or divert LPD's funds to its own use.
 - 55. All of Philips' transactions with LPD were at arms-length.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 10, 2014 in Observate the Netherlands Franciscus Johannes Spaargaren MDL 1917 Active 15226772.3 DECLARATION OF FRANCISCUS JOHANNES SPAARGAREN

SEALED EXHIBIT 10 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal SEALED EXHIBIT 11 TO CATHLEEN H. HARTGE
DECLARATION IN SUPPORT OF DEFENDANT LG
ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION
FOR PARTIAL SUMMARY JUDGMENT ON
WITHDRAWAL GROUNDS – Filed Under Seal

EXHIBIT 12 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 12 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

Notes document id 57464248D4CC8728852569AE005879D4

\$Created	11/27/2000 02:09:30 PM
\$Modified	11/27/2000 02:09:41 PM
\$Moods	N
\$UpdatedBy	CN=Tom Heiser/O=HEDUS
Body	Original Message From. Gerard Corbett [mailto:gerard.corbett@hal.hitachi.com] Sent: Monday, November 27, 2000 2:55 AM To: Abigail Bradford; Alan Wong; andrew mulazzi; Barbara Dyer; Benjie Hopkins; Bill Davis; Bill Melo; Bill Porter; Carl J. Green; Charlotte Bradford; Chrislyn Brandt; Clare hassall; Clare Thomsen; Craig Kerkove; Daniel M. Mahoney; David J. Brozek; Driessen Mike; Ed Vales; Eric Kreis; Felix McNulty, Frank Fowler; Gary Bennett; Gary Galusha; Geert Lievens; gene.murphy@hal.hitachi.com; geoffb@hvbi.com; Gerry Gilhuly; Haydee Lopez; Hiroaki Hamano; Hisashi (Shaw) Funami; Jack Brietenbucher; Janjigian Mike; Jeff Muscatine; Jill Kuglar; Jim Sogas; Joanna Macgovern, Joe Ragonese; Joe Smallwood; John Henderson, Kantaro Tanii; Kaz Masamoto; Kurt Ibsen; Laine Maniquis; Larry Royalty; Leo Delaney; Leslie Bishop; Linda Duffy; Lock Vicki; Lou Caro; mike janjigian@hii-hitachi.com; Nina Sison; Parker; Pat Reilly; Pete Denes; Pete Scobel; Pete Westafer, Peter Doelling; Rachel Scharlat; Reiko Nishiguchi; Rich Gadomski; Riemer Hans; Robert Lahr; Robert Neudecker; Roland Gomez; Ron Bechtold; Rose Chojnacki; Russell Stump; Sam-hapla van den Berg/hapla; Sandra Renihan; Satoshi Kinoshita; Scott Baker; Scott Barnette; scott koreski; Sosei Katsumoto; Stephanie Tyler; Steve Meadows; Steven Zivanic; Stuart Kirk; Tamara Deschryver; Tatsuya Kubo; Terry Cooper; Tom Barrett; Tom Heiser; Tom Smith; Vincent Lavallee Subject: MORNING NEWS BRIEFS ************************************

4 billion yen for five hydroelectric power water mills from an electricity utility in China's Hunan Province, officials at the Japanese firms said. The water mills each have an output capacity of 45,000kw and a diameter of six meters. They will be built on a riverbed, generating power from natural water flow which will minimize the adverse impact on the environment. Hunan Wuling Hydropower Development Co. partnered with another Chinese firm, Harbin Electric Machinery Co., on the order. Construction of the facilities will be the first in China to be covered by yen loans allocated to promote environmental protection. More such loans are likely to be made for similar projects and for the installation of desulfurizing equipment at power plants, sources said. Hitachi receives most of its orders for hydroelectric power plants from China and South America. * * * From The Wall Street Journal WAL-MART AND SEARS saw robust gains in sales from last year on the day after Thanksgiving as the holiday shopping season began. The increases were driven by early-morning discounts of as much as 50% on select items. * * * Boeing is expected to receive orders for at least 113 of its big 777 airliners this year, valued at more than \$18 billion. The record annual total would put demand for the jets well ahead of comparable models by rival Airbus of Europe. * * * Climate talks collapsed over levels of emissions-reduction credits the U.S. and other countries would get for absorption of carbon dioxide in their forests and farmlands. But negotiators plan to resume Kyoto treaty talks next year. * * * Japan's NTT DoCoMo is close to a deal to acquire a 16% to 18% stake in the wireless arm of AT&T for nearly \$10 billion, say people familiar with the talks. The pact would provide AT&T Wireless and its parent with much-needed cash. * * * AT&T Broadband, a unit of AT&T, told several companies that it won't accept further deliveries of products for its cable-television networks for the rest of the year. Some suppliers' shares fell on the news. * * * Flight delays were reported for some travelers returning home from the Thanksgiving holiday. Rain, low visibility and scattered labor protests were to blame for the slow service. * * * American Airlines and British Air senior executives hope to use a meeting of their Oneworld alliance this week to re-energize the airline group and their own stalled bilateral relations. * * * The Nasdaq composite surged 149.04, or 5.4%, to 2904.38 Friday, rebounding from recent losses as investors snapped up some hard-hit technology shares. The Dow industrials gained 70.91 to 10470.23. * * * Universal Pictures' "The Grinch" stole Thanksgiving from Walt Disney, grossing an estimated \$73.8 million during the five-day holiday weekend. * * * Japan's Softbank returned to profitability for the half-year ended Sept. 30, and its president said the technology company's shares are undervalued. * * * Credit Agricole stepped in to help trans-Atlantic investment bank Lazard buy out a French financier's stake in a Lazard holding company in a transaction valued at \$502 million. * * * Microsoft plans to launch this spring Train Simulator, a computer game that reflects a resurgence in model trains. * * * Sharp of Japan plans to enter the crowded U.S. market with an entertainment-oriented device that will offer Web access and downloading of color video. * * * FedEx's founder, Frederick W. Smith, underwent heart-bypass surgery. But the chairman and CEO is expected to return soon to his duties. * * * Retailers Slash Prices to Draw Those Wary Holiday Shoppers The kickoff of the holiday shopping season made one thing clear: Mark it down and they will come. Worried that this year's holiday sales could pale compared with last year's blockbuster selling season, retailers across the country took the offensive by offering steep discounts and managed to lure substantial numbers of shoppers. For the aggressive consumer, there were deals to be found not only on the season's hottest items, such as DVD players, digital cameras and scooters, but also on some staple gift items such as clothing that haven't sold well in the recent economic slowdown. The Macy's store at the South Shore Plaza mall in Braintree, Mass., was decked out in holly boughs, gold ribbons -- and red clearance signs. "Look around. You'll find some great deals," advised one sales clerk. Sure enough, much of the already marked-down women's sportswear was discounted further at the register. Final price for a red sweater by Jones New York: \$42, down from \$84 originally. Meanwhile, the nation's largest retailers, Wal-Mart Stores Inc. and Sears, Roebuck & Co., both saw healthy

increases in sales from last year on the day after Thanksgiving, driven by early-morning discounts of as much as 50% on select items. At Sears, weekend gains were led by apparel, a category that has been weak for the retailer all year. Women's dresses and other ready-to-wear items, which were discounted about 50%, saw increases of as much 30%. The stores also did a strong business in shoes, leather coats, fine jewelry and tools. The payoff for such discounting was evident in the sales figures: Wal-Mart, based in Bentonville, Ark., said same-store sales on Friday rose 4% to 6% over the same day last year, while total sales for the day increased to more than \$1.1 billion, up slightly from last year. Sears's Friday sales rose more than 6%, beating out the day after Thanksgiving last year as the best sale day in the 114-year-history of the company, based in Hoffman Estates, Ill. "This has gotten off to a great start, so we have to be optimistic," says Mary Conway, Sears's president of stores. Overall, mall traffic on the day after Thanksgiving rose 9.7% to 67.6 million visitors from the year before, by one count. And traffic at department stores in particular rose 8.2% to 83.1 million, according to RCT Systems Inc.'s National Retail Traffic Index, which draws data from a sample of the nation's 1,500 enclosed malls. And Internet sales -- helped by discounting as well -- got a big boost, jumping 26% to \$105.1 million, according to BizRate.com, a Los Angeles firm that tracks orders from about half of all online shopping sites. Despite a momentary technical hiccup on Friday morning when its site briefly crashed, Amazon.com was on track to crack the 11 million mark for items ordered on its site since Nov. 2, when it opened a special holiday gift store. But even with such gains, the early discounting makes it difficult to gauge the true success of the weekend. At a cost to profits, discounting created momentum, but can retailers perpetuate it through Christmas? After Friday's healthy surge, consumer mall traffic rose a more modest 3.6% on Saturday from the year before, to 49 million visitors. And traffic at department stores inched up just 0.4% on Saturday to 56.8 million, according to RCT. "This weekend's traffic was almost completely due to special promotions. There wasn't one big toy to get people into the stores, so [retailers] had to run promotions to get people there early," says John Konarski, senior vice president at the International Council of Shopping Centers, a New York-based trade group. With factors such as higher home heating prices and uncertainty about the presidential election detracting from consumer confidence, this holiday season isn't expected to be as robust as those of years past. Jeff Feiner, a Lehman Brothers retail analyst, projects a sales increase of 3% to 5%, compared with 7% last year. "It will be an OK Christmas selling season, but not a buoyant one," Mr. Feiner says. The discounts don't look to be ending anytime soon. Kmart Corp.'s BlueLight.com e-commerce Web site plans to begin offering blue-light specials in cyberspace Monday, highlighted by a special offer of a limited number of the much coveted Sony PlayStation 2 for \$499. BlueLight, based in San Francisco, hopes to use the PlayStation to draw shoppers to its site. That means holiday shoppers can continue celebrating some really good deals -- as they did this weekend. Lisa Kaiser shopped on the day after Thanksgiving for the first time this year, lured by all the bargains. She arrived at the Best Buy store in Evanston, Ill., about 45 minutes before the store's 7 a.m. opening, and quickly snapped up big-ticket items such as a \$249 digital camera and a \$99 cordless telephone, both on sale. * * * Holiday Shopping Off to Solid Start NEW YORK (AP) -- The first weekend of the holiday shopping season turned out to be a pleasant surprise for worried retailers: The consumers who crowded malls and logged onto e-commerce sites spent more than expected as they snapped up the season's must-have items. Sweaters, coats and other apparel items, bouncing back from a months-long slump, were the top sellers in stores and online. In fact, clothing turned out to be the most popular category on the Internet on Friday, followed by consumer electronics. Scooters and robotic pets were the big standouts in toys. ``Sales looked pretty decent," said Michael P. Niemira, vice president of the Bank of Tokyo Mitsubishi on Sunday, estimating that the weekend's sales will be about 5 to 6 percent higher than last year. "It's a good start to the season. But where it goes from here remains to be seen." The solid sales followed months of sluggish business for many retailers, but the Thanksgiving weekend receipts were the result

of hard work on the part of merchants. Faced with an overall drop in consumer spending, retailers began discounting earlier than usual and focused more on what they expect will be the hot items. Sears, Roebuck and Co., for example, is holding its "Best Prices of the Season" campaign in early December, instead of after the holidays. A combination of stock market volatility, high interest rates, and rising fuel prices have made consumers cut back on things they don't really need. Analysts say the unresolved presidential election has contributed to Americans' uncertainty. Despite the strong start to the season, retailers are nervous about consumers like David Penner, a 58-year-old teacher from Andover, Mass., who plans to cut his holiday budget because he is spending \$100,000 in home renovations. They also want Eleanor Jaick, a 55-year-old resident of Florham Park, N.J., who was just browsing on Saturday at New Jersey's Short Hills Mall, to get excited about the chunky sweaters and leather coats being offered this season. * * * Korea LG Elec: To Form TV Picture Tube JV With Philips SEOUL -- South Korea's LG Electronics Co. (Q.LGE) said Monday it has signed a letter of intent with Royal Philips Electronics NV (PHG) to enter a business alliance, including establishment of a picture tube joint venture through a merger of the two sides' cathode ray tube operations. * * * Japan's NTT DoCoMo Nears Agreement On \$10 Billion Stake in AT&T Wireless Japan's NTT DoCoMo Inc. is close to an agreement to acquire a 16% to 18% stake in AT&T Wireless Corp. for nearly \$10 billion, according to people familiar with the situation. A deal between NTT DoCoMo, a wireless unit of Japan's Nippon Telegraph & Telephone Corp., and AT&T Wireless, the wireless arm of AT&T Corp., Basking Ridge, N.J., is expected later this week, these people said. NTT DoCoMo is expected to acquire the minority position in AT&T Wireless by purchasing the stake from both parent company AT&T and the wireless unit. AT&T Wireless currently trades as a tracking stock of AT&T, but AT&T plans to spin off its 85% ownership in the wireless company and convert the unit's tracking stock into an assetbased common stock sometime next year. The remaining 15% of AT&T Wireless is publicly held. It couldn't be determined how the proceeds from NTT DoCoMo would be divided between AT&T and AT&T Wireless. However, such a deal would provide both companies with much-needed cash. Parent company AT&T, which is in the midst of a major restructuring, would conceivably use the money to help pay down some of its \$62 billion in debt. AT&T Wireless would likely use the financial investment to bulk up ahead of federal wireless auctions that are expected to take place next month. Those auctions could reach into the millions of dollars as wireless companies bid for frequency spectrum to boost the capacity of their networks. While AT&T Wireless has the most spectrum of any U.S. wireless firm, it is still expected to participate in the auctions. One of the aucti@ • : !!.

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SEALED EXHIBIT 13 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal EXHIBIT 14 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 14 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

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Page 1
 1
                 UNITED STATES DISTRICT COURT
                NORTHERN DISTRICT OF CALIFORNIA
 2
                     SAN FRANCISCO DIVISION
 3
 4
      IN RE: CATHODE RAY TUBE (CRT)
      ANTITRUST LITIGATION
                                    ) No. 07-cv-05944 SC
 5
                                      ) MDL No. 1917
      This Document Relates to:
 6
      ... (continuing caption page 2) )
 7
           SUPERIOR COURT OF THE STATE OF CALIFORNIA
 8
               CITY AND COUNTY OF SAN FRANCISCO
 9
10
      STATE OF CALIFORNIA, et al.,
11
                      Plaintiffs,
                                      ) No. CGC-11-515784
12
              v.
13
      SAMSUNG SDI, INC., CO., LTD,
      et al.,
14
                     Defendants.
15
16
                      HIGHLY CONFIDENTIAL
17
                DEPOSITION OF LG ELECTRONICS
18
                        KYUNG TAE KWON
19
                   San Francisco, California
20
                      Friday, July 13, 2012
21
                           Volume I
22
     Reported by:
     SUZANNE F. BOSCHETTI
23
    CSR No. 5111
24
25
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		Page 27
1	A Because the company was handed over to LG	09:54:50
2	Philips, I don't believe it does now.	09:54:57
3	Q Does LGCNS, the company you mentioned	09:55:00
4	earlier as managing the computer system of LG	09:55:06
5	Electronics, have any information regarding costs of	09:55:10
6	the manufacture, sale or distribution of CRTs from	09:55:16
7	the period 1995 through June 2001?	09:55:21
8	MR. MUDGE: Object. Foundation and form.	09:55:25
9	THE WITNESS: Well, because LGCNS is a	09:56:24
10	company that manages our company at the time our	09:56:29
11	company was being divided at the time of the	09:56:35
12	division with the LG Philips Display, I believe when	09:56:46
13	the assets were being transferred, I think those	09:56:51
14	things were transferred as well.	09:57:01
15	MR. KIM: Objection to the translation.	09:57:05
16	Not instead of "those things," electronic data,	09:57:07
17	that system.	09:57:11
18	THE INTERPRETER: This interpreter did not	09:57:14
19	hear that electronic data in the testimony.	09:57:16
20	MR. KIM: He mentioned	09:57:21
21	MR. SPECKS: Okay. Let's not have an	09:57:23
22	argument. You have your objection.	09:57:24
23	MR. MUDGE: That's fine.	09:57:26
24	BY MR. SPECKS:	09:57:28
25	Q All right. Let's let's was any	09:57:28

		Page 28
1	investigation done by you or anyone else to	09:57:30
2	determine whether or not LG Electronics Inc. has any	09:57:33
3	information for the period 1995 through June 2001	09:57:38
4	regarding the costs of manufacturing, selling or	09:57:43
5	distributing CRTs?	09:57:47
6	A I checked that with the CNS.	09:58:26
7	Q With who at CNS?	09:58:30
8	A The general manager, Choong Jeong Lee.	09:58:37
9	THE INTERPRETER: C-h-o-o-n-g, J-e-o-n-g,	09:58:40
10	L-e-e.	09:58:45
11	BY MR. SPECKS:	09:58:48
12	Q And what did he tell you?	09:58:48
13	A I heard from him that at the time the	09:59:07
14	company was being divided in 2001, the electronic	09:59:12
15	data, including emails, were handed over as part of	09:59:18
16	the information asset.	09:59:25
17	Q And do you know whether CNS retained any	09:59:28
18	backup tapes of any of the data that they were	09:59:33
19	turning over?	09:59:36
20	A Well, the way CNS manages our company was	10:00:13
21	to have a basic data, original data and the backup	10:00:22
22	data. But then to my understanding because the	10:00:28
23	original data and backup data are running together,	10:00:32
24	if one of them were transferred, I believe backup	10:00:37
25	data also was transferred.	10:00:42

212-267-6868

Page 111 1 I, the undersigned, a Certified Shorthand 2 Reporter of the State of California, do hereby 3 certify: 4 That the foregoing proceedings were taken 5 before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, 6 7 prior to testifying, were duly sworn; that a record 8 of the proceedings was made by me using machine 9 shorthand which was thereafter transcribed under my 10 direction; that the foregoing transcript is a true 11 record of the testimony given. 12 I further, certify I am neither financially 13 interested in the action nor a relative or employee 14 of any attorney or party to this action. 15 IN WITNESS WHEREOF, I have this date 16 subscribed my name. 17 Dated: 7/21/12 18 19 20 21 22 23 SUZANNE F. BOSCHETTI 24 CSR No. 5111 25

	Page 110
1	
2	
3	
4	
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7	
8	I, KYUNG TAE KWON, do hereby declare under
9	penalty of perjury that I have read the foregoing
10	transcript of my deposition; that I have made such
11	corrections as noted herein, in ink, initialed by
12	me, or attached hereto; that my testimony as
13	contained herein, as corrected, is true and correct.
14	EXECUTED this 22 day of August,
15	20 12, at Seoul, Korea.
16	(City) (State)
17	1 V 11/2 +DZ 10 101 1 101
18	KYUNG TAZ KWON KM
	KYUNG TAE KWON
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SEALED EXHIBIT 15 TO CATHLEEN H. HARTGE
DECLARATION IN SUPPORT OF DEFENDANT LG
ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION
FOR PARTIAL SUMMARY JUDGMENT ON
WITHDRAWAL GROUNDS – Filed Under Seal

SEALED EXHIBIT 16 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal SEALED EXHIBIT 17 TO CATHLEEN H. HARTGE
DECLARATION IN SUPPORT OF DEFENDANT LG
ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION
FOR PARTIAL SUMMARY JUDGMENT ON
WITHDRAWAL GROUNDS – Filed Under Seal

SEALED EXHIBIT 18 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal EXHIBIT 19 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 19 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

Page 1

UNITED STATES DISTRICT COURT 1 2 NORTHERN DISTRICT OF CALIFORNIA 3 SAN FRANCISCO DIVISION 4 5 HIGHLY CONFIDENTIAL CATHODE RAY TUBE 6 IN RE: (CRT) ANTITRUST LITIGATION No. 3:07-CV-05944 7 8 9 10 -- HIGHLY CONFIDENTIAL --11 12 13 14 15 Videotaped deposition of PIL JAE LEE, VOLUME 1, taken at the Hilton Los Cabos Beach & Golf Resort, 16 17 Transpeninsular Highway, 23447 Cabo San Lucas, Baja 18 California Sur, Mexico commencing at 9:01 A.M., 19 on Tuesday, July 16, 2013, before Leslie Rockwood, 20 RPR, CSR No. 3462. 21 22 23 24

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Case 4:07-cv-05944-JST Document 3043-1 Filed 11/07/14 Page 82 of 125 HIGHLY CONFIDENTIAL

		Page 48
1	THE INTERPRETER: The witness this is by the	10:59:00
2	main interpreter. The witness also mentioned that he was	10:59:02
3	involved in restructuring as well.	10:59:06
4	CHECK INTERPRETER: That's correct. Partly.	10:59:09
5	Q. BY MS. CASSELMAN: So when you say that there	10:59:15
6	was restructuring within LPD and that your role involved	10:59:17
7	allocating CRTs to different factories, were you involved	10:59:25
8	in any closures of LPD factories?	10:59:30
9	MR. TEMKO: Object. Vague and ambiguous and	11:00:00
10	mischaracterizes the prior testimony.	11:00:02
11	THE WITNESS: At the time, as a person in the	11:00:53
12	sales department, my role was to give advice. For	11:00:56
13	example, if certain factory needed to close, if we	11:01:02
14	consider that option, then as a person in sales, I would	11:01:08
15	give advice as to the options, whether it will be better	11:01:15
16	to close that factory now or next year, or if that	11:01:21
17	factory would be viable and come back to normal stage	11:01:27
18	later on. So in the position of the sales, that was the	11:01:33
19	kind of advice I gave. Not involved in the restructuring	11:01:38
20	itself.	11:01:45
21	Q. BY MS. CASSELMAN: In July 2001 when LPD was	11:01:47
22	formed, did any LG factories close?	11:01:52
23	A. LG	11:02:03
24	MR. HWANG: LG factories.	11:02:03
25	THE WITNESS: LG original factory.	11:02:09

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HIGHLY CONFIDENTIAL

		Page 49	
1	MS. CASSELMAN: I think I just said or meant to	11:02:12	
2	say any LG factories.	11:02:15	
3	THE WITNESS: Well, to be more precise, after	11:02:25	
4	LPD was formed, all the factories were referred to as LPD	11:02:29	
5	factories. No factory was referred to as LG factories	11:02:33	
6	any longer.	11:02:37	
7	Q. BY MS. CASSELMAN: Oh, I understand that.	11:02:39	
8	I'm my question is: At the time that LPD was formed,	11:02:41	
9	did any factories close and, therefore, not make it to	11:02:45	
10	become LPD factories?	11:02:49	
11	A. No.	11:03:09	
12	Q. Do you know if there were any employee layoffs	11:03:09	
13	when LPD was formed former LG employees who did not	11:03:14	
14	become strike that. Let me try this again.	11:03:18	
15	At the time that LPD was formed, were there any	11:03:20	
16	LG employees in the CRT industry who did not go to work	11:03:23	
17	for LPD?	11:03:28	
18	A. To my understanding, there was hardly any	11:03:56	
19	employees who did that, because almost everybody in its	11:03:59	
20	entirety was moved.	11:04:04	
21	Q. So if I understand your testimony, you said	11:04:13	
22	hardly any employees did that. Did you mean hardly any	11:04:16	
23	employees stayed with LG?	11:04:21	
24	CHECK INTERPRETER: Can you I'm sorry.	11:04:36	
25	Ms. Kim, would you please repeat and retranslate the	11:04:39	
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Case 4:07-cv-05944-JST Document 3043-1 Filed 11/07/14 Page 84 of 125 HIGHLY CONFIDENTIAL

Page 176 1 STATE OF CALIFORNIA) ss: COUNTY OF MARIN 3 I, LESLIE ROCKWOOD, CSR NO. 3452, do hereby 4 certify: 5 That the foregoing deposition testimony was 6 7 taken before me at the time and place therein set forth and at which time the witness was administered the oath; 8 9 That testimony of the witness and all objections 10 made by counsel at the time of the examination were recorded stenographically by me, and were thereafter 11 12 transcribed under my direction and supervision, and that the foregoing pages contain a full, true and accurate 13 record of all proceedings and testimony to the best of my 14 15 skill and ability. 16 I further certify that I am neither counsel for 17 any party to said action, nor am I related to any party 18 to said action, nor am I in any way interested in the outcome thereof. 19 20 IN WITNESS WHEREOF, I have subscribed my name 21 this 25th day of July, 2013. 22 23 24 25 LESLIE ROCKWOOD, RPR, CSR NO. 3462

HIGHLY CONFIDENTIAL

	Page 175
1	I declare under the penalty of perjury under the
2	laws of the State of California that the foregoing is
3	true and correct.
4	Executed on Sep. 17, 2013, at
5	<u>Seoul</u> , Koreaj
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8	PIL JAE LEE
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SEALED EXHIBIT 20 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal SEALED EXHIBIT 21 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal SEALED EXHIBIT 22 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal EXHIBIT 23 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 23 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	
4	BEST BUY CO. INC., BEST BUY :
5	PURCHASING LLC, BEST BUY :
6	ENTERPRISE SERVICES, INC. BEST : Master File No.
7	BUY STORES, L.P., Bestbuy.com, : 3:07-cv-05944-SC
8	LLC, and MAGNOLIA HI-FI, LLC., : MDL No. 1917
9	Plaintiffs, :
10	vs. :
11	LG,
12	Defendant. :
13	
14	VIDEOTAPED DEPOSITION OF YOUNG BAE NA
15	Tuesday, September 23, 2014
16	commencing at 9:16 a.m.
17	Lewis Silkin LLP
18	5 Chancery Lane
19	Clifford's Inn
20	London, EC4A 1BL
21	United Kingdom
22	Reported by:
23	Thelma Harries, MBIVR, ACR
24	
25	PAGES 1 - 271
	Page 1

1	MR. SILBERFELD: It's up to you.	
2	Chuck? (Same handed)	
3	Nicole. I'm sorry to throw it, but	
4	there you go.	
5	THE INTERPRETER: Thank you.	
6	MR. SILBERFELD: (To Mr. Temko) And	
7	you have one?	
8	MR. TEMKO: I have a copy.	
9	MR. SILBERFELD: Okay, great.	
10	(Exhibit 7501 marked for	
11	identification)	
12	BY MR. SILBERFELD:	
13	Q We'll come back to the topics in the	
14	Notice in a little while, but let's just talk about	
15	Exhibit 7501. 09:45AM	
16	It is a document consisting of	
17	fourteen pages. And you've reviewed this, have you	
18	not, Mr. Na?	
19	A Yes, I did.	
20	Q And, as you understand it, is this 09:46AM	
21	document intended by you and by LG to be	
22	a reference document with regard to the four topics	
23	that are the subject of your deposition and the	
24	company's deposition here today?	
25	A Yes. 09:46AM	
	Page 25	

```
MR. TEMKO: Can I -- I'm not trying
1
 2
       to interrupt the deposition. I think, technically,
       they're labelled, so I -- I'm not sure that this
 3
       purports to reflect all four topics, but you'll see
4
       that they're labelled Topic 1 topic. So I think
5
                                                             09:46AM
6
       it's --
7
                     MR. SILBERFELD: At least some of
       them.
8
9
                     MR. TEMKO: Yes.
                     MR. SILBERFELD: Yes.
10
11
                     MR. TEMKO: Yes.
12
                     MR. SILBERFELD: I mean, for example,
       the last topic for today has to do with litigation
13
       between the companies. I don't think that's
14
       covered in here.
                                                             09:47AM
15
                     MR. TEMKO: That's -- that was my
16
       only point.
17
                     MR. SILBERFELD: I think that's
18
19
       exactly right.
       BY MR. SILBERFELD:
                                                             09:47AM
20
                     Mr. Na, did -- did you participate in
21
               Q
       some way in the creation of Exhibit 7501?
22
23
                     MR. TEMKO: Object. Vague and
24
       ambiguous.
                     THE WITNESS: No, I wasn't involved 09:47AM
2.5
                                                           Page 26
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1	in making this plan.	
2	(Interpreted) My understanding was	
3	is that this particular document was compiled or	
4	prepared by our legal team.	
5	BY MR. SILBERFELD: 09:48AM	
6	Q Okay. You've read it?	
7	A Yes, I did.	
8	Q Does it appear accurate to you?	
9	A Yes.	
10	Q Okay. You may use it at any time for 09:48AM	
11	purposes of answering any of my questions, all	
12	right?	
13	Okay, thank you.	
14	When you went through this, Mr. Na,	
15	did you find any errors or mistakes? 09:48AM	
16	A (Interpreted) No, I was not able to	
17	find anything that would be specifically indicated,	
18	as such.	
19	And when you reviewed this for	
20	accuracy, did you do so just from your memory of 09:48AM	
21	the events, some of which are reflected here?	
22	A Yes.	
23	Q All right. So now turning back to	
24	the deposition Notice, which is the document on	
25	your left, the the first topic for today is the 09:49AM	
	Page 27	

1	was formed?	
2	A June 2001.	
3	Q And as of June 2001, Mr. Na, what d	id
4	LG contribute to the joint venture that became LP	D?
5	A Excuse me, "contribute" means?	09:59AM
6	(Interpreted) Excuse me,	
7	"contribute" means?	
8	Q Oh, I'm sorry.	
9	In forming LPD, LG put something in	to
10	the joint venture and Philips put something into	09:59AM
11	the joint venture.	
12	Again, not in precise details	
13	I just want to get a general sense of this from	
14	you what did LG contribute to the joint venture	e?
15	(Interpreted) For the joint venture	e, 10:00AM
16	both companies, LG as well as Philips, contributed	d
17	assets, and, in the assets, these are included;	
18	the talents, factory, the site for factory,	
19	technology. Those were the asset contributions	
20	made for the joint venture.	10:00AM
21	Q Did LG contribute, in addition to the	he
22	factory and factories and the technology, the	
23	employees who formerly worked for LG would now wo:	rk
24	for LPD?	
25	A (Interpreted) That's correct.	10:01AM
		Page 35

1	Something lik	e that?	
2	A	Around two thousand.	
3	Q	Okay. And LG contributed factories	
4	or facilities	to the joint venture, correct?	
5	A	Yes.	10:03AM
6	Q	And how many such factories or	
7	facilities we	re there, do you know? Approximately?	
8	A	Several.	
9	Q	I'm sorry?	
10	A	Several factories.	10:03AM
11	Q	Several?	
12	A	Yes.	
1,3	Q	Less than five?	
14	А	Around five. Five/six.	
15	Q	Okay. And LG also contributed assets	10:03AM
16	to the joint	venture in the form of technology,	
17	correct?		
18	A	Yes.	
19	Q	And that would be know-how, patents,	
20	and the like?		10:03AM
21	A	(Interpreted) As for the patents,	
22	I don't reall	y know as to what extent, but	
23	obviously kno	w-hows and technologies, along with	
24	talents, went	over to that.	
25	Q	And, as you understand it, did	10:04AM
			Page 37

1	Philips also contribute facilities, technology and	
2	its employees to the joint venture?	
3	MR. MALAISE: Objection. Vague as to	
4	Philips.	
5	THE WITNESS: (Interpreted) As for 10:04AM	
6	the Philips, I don't have I don't have exact	
7	information, but that's my understanding.	
8	BY MR. SILBERFELD:	
9	Q Okay. We'll talk about the	
10	management structure of LPD in a moment, but let me 10:04AM	
11	go back to the first page of Exhibit 7501 now under	
12	the heading LPD.	
13	Do you see that, sir?	
14	A Yes.	
15	Q Okay. It says June 26, 2001 (date of 10:04AM	
16	formation), LGEI and LG Electronics Wales Limited	
17	collectively held a 50 per cent minus one share	
18	interest. LGEI held a 37-and-a-half per cent	
19	ownership interest and LG Electronics Wales Limited	
20	held a 12-and-a-half per cent interest. 10:05AM	
21	Is that a true and correct	
22	description of the ownership that LGEI and	
23	LG Electronics Wales had in LPD at the date of	
24	formation?	
25	A Yes. 10:05AM	
	Page 38	

1	the purpose, SVB was there to provide high level	
2	guidance to LPD and also to assist, and that was	
3	the role. And that is how it's stated in the JVA.	
4	And, as for the SVB, as far as my	
5	understanding goes, by the law of Netherlands, they	10:30AM
6	can operate in that manner.	
7	BY MR. SILBERFELD:	
8	Q Was part of the rationale for having	
9	a supervisory board, the protection of LG's	
10	investment when it contributed its assets to the	10:30AM
11	formation of LPD?	
12	A (Interpreted) No, that was not one	
13	of the rationales.	
14	Q LPD had other management structures	
15	too, did it not? It had officers, for example?	10:31AM
16	A (Interpreted) Internally, inside LPD	
17	it existed.	
18	(In person) Yes.	
19	Q Okay. And so it was not part of the	
20	job of the supervisory board members to run the	10:32AM
21	business of LPD day-to-day, correct?	
22	A It's totally different. The SVB's	
23	mission and the management in the LPD, they had the	
24	full responsibility to manage LPD.	
25	Q Right.	10:32AM
	j	Page 46
	Century Court Reporters, A VERITEXT COMPANY	

1 2 3	COURT REPORTER: I'm sorry, I thought he was talking Korean. I was waiting for the interpreter. I'm really sorry. Could you repeat	
4	that? [I'm sorry.] [If he's going in and out]	
5	THE WITNESS: (Interpreted) Correct. 10:3	2AM
6	LPD internally had a management inside and they	
7	were fully responsible of managing the company, and	
8	SVB had it was totally different from that.	
9	BY MR. SILBERFELD:	
10	Q The SVB, the supervisory board, 10:3	2AM
11	provided broad guidance, strategy and oversight?	
12	Is that a fair way to say it?	
13	A (Interpreted) Well, I don't have	
14	strike that.	
15	I don't know the exact definition of 10:3	3AM
16	"oversight", but, just like you have stated, its	
17	job was to provide high level strategy guidelines	
18	and also to approve proposed plans.	
19	Q And the supervisory board provided	
20	that high level guidance to whom? 10:3	3AM
21	A To whom? LPD	
22	(Interpreted) To LPD's management.	
23	Q Perfect.	
24	When you served on the supervisory	
25	board, did you participate in providing high level 10:3	4AM
	Page 47	7

1	guidance and strategy to LPD's management?	
2	A Yes, I did, in partial.	
3	Q For the time you served?	
4	A Yes.	
5	Q Okay. And when you served on the 10:34AM	
6	supervisory board, Mr. Na, between 2003 and 2005,	
7	was it part of your responsibility to report back	
8	to LGEI what it was that you were learning and	
9	recommending to LPD's management?	
10	A LGEI. No, we didn't report to LGEI. 10:34AM	
11	Q You didn't report.	
12	A LGEI people was the owner of the	
13	supervisory board, so	
14	Q I'm sorry, perhaps you could answer	
15	in Korean? 10:35AM	
16	A (Interpreted) So your question is	
17	whether we reported back to LGEI, correct?	
18	Q Correct. That's the question.	
19	A (Interpreted) No, we did not.	ı
20	Q Do you recall how many members of the 10:35AM	
21	supervisory board there were supposed to be	
22	according to the joint venture agreement?	
23	(Interpreted) My understanding is	
24	three.	
25	<pre>Three by each company?</pre> 10:35AM	
	Page 48	

1	A By eac	ch company.	
2	Q Three	by LG and three by Philips?	
3	A Yes.		
4	Q Okay.	If you look at this page,	
5	you'll see the names	s of many individuals and their	10:36AM
6	tenure and then who	designated them.	
7	Let me	e ask you about the ones	
8	designated by LGEI,	all right?	
9	A Yes.		
10	Q The fi	irst one is Nam K. Woo. Do you	10:36AM
11	see that?		
12	A Yes, I	I do.	
13	Q Mr. Wo	oo is it Mr. Woo, by the way?	
14	A Yes, N	Mr. Woo.	
15	Q Okay.	Did Mr. Woo, according to	10:36AM
16	this, serve on the s	supervisory board from 2002 to	
17	2003 and a short tim	me in 2004, is that correct?	
18	A Yes,	it is.	
19	Q Okay.	Did Mr. Woo have a job at LGEI	
20	as well, in addition	n to these responsibilities?	10:36AM
21	A Yes, h	ne did.	
22	Q Do you	a know what his job was in this	
23	time frame?		
24	A I thir	nk he was the head of head of	
25	some the business	s unit which handles IT product,	10:37AM
			Page 49
	I .		ı

1	you could, please, re-state your answer. Thank	
2	you.	
3	COURT REPORTER: "Q. And what is	
4	your understanding of the roles and	
5	responsibilities of the group management team	
6	members? What were they to do?"	
7	THE WITNESS: They are the,	
8	literally, the management team management team	
9	of the LPD, LPD operation. So they are fully	
10	involved in the the operation. Everything. 11:05AM	
11	BY MR. SILBERFELD:	
12	Day-to-day management of the	
13	business?	
14	A Yes, they did.	
14	A Yes, they did. Q And what is your understanding of how 11:05AM	
15	Q And what is your understanding of how 11:05AM	
15 16	Q And what is your understanding of how 11:05AM many members of the group management team there	
15 16 17	Q And what is your understanding of how 11:05AM many members of the group management team there were to be?	
15 16 17 18	Q And what is your understanding of how 11:05AM many members of the group management team there were to be? A To my understanding, it used to be	
15 16 17 18 19	Q And what is your understanding of how 11:05AM many members of the group management team there were to be? A To my understanding, it used to be ten and it and and the group management team	
15 16 17 18 19 20	Q And what is your understanding of how 11:05AM many members of the group management team there were to be? A To my understanding, it used to be ten and it and and the group management team that may that body was renamed as an executive 11:05AM	
15 16 17 18 19 20 21	Q And what is your understanding of how 11:05AM many members of the group management team there were to be? A To my understanding, it used to be ten and it and and the group management team that may that body was renamed as an executive 11:05AM board, and the number rise down to four; from ten	
15 16 17 18 19 20 21 22	Q And what is your understanding of how 11:05AM many members of the group management team there were to be? A To my understanding, it used to be ten and it and and the group management team that may that body was renamed as an executive 11:05AM board, and the number rise down to four; from ten to four.	
15 16 17 18 19 20 21 22 23	Q And what is your understanding of how 11:05AM many members of the group management team there were to be? A To my understanding, it used to be ten and it and and the group management team that may that body was renamed as an executive 11:05AM board, and the number rise down to four; from ten to four. Q Do you know when that change	

1	A Yes, I do.	
2	Q Now, let's turn to page 11. This is	
3	a chart of the LPD executive board members.	
4	If I could just ask you to turn back	
5	to page 9 for a moment?	11:14AM
6	With the exception of the first entry	
7	about Mr. Combes, do you see that all the other end	
8	dates for their tenure on the group management team	
9	are September 10th, 2002? Do you see that, sir?	
10	A September 10th, yes.	11:15AM
11	Q Yeah. All the dates end at	
12	September 10th, 2002?	
13	MR. HWANG: I believe J.D. Choi is	
14	another exception.	
15	COURT REPORTER: I'm sorry?	
16	MR. HWANG: J.D. Choi is another	
17	exception	
18	MR. SILBERFELD: You're right.	
19	MR. HWANG: just to clarify.	
20	BY MR. SILBERFELD:	11:15AM
21	Q Two exceptions; Mr. Combes and	
22	Mr. Choi. But all others ended September 10th,	
23	2002.	
24	Is it your understanding, Mr. Na,	
25	that the group management team changed around	11:15AM
	1	Page 77

1	September 2002 to become the executive board? Is	
2	that your understanding?	
3	Yeah, that's my understanding.	
4	Q Okay, great.	
5	So now go back to page 11, and we 11:15AM	
6	have the executive board members. And some of the	
7	names here are the same as some of the names of	
8	the group management team, correct, such as	
9	Mr. Combes?	
10	A Yes. 11:16AM	
11	Q Okay. Is it your understanding that	
12	LGEI formally in some way appointed these	
13	individuals to serve on the executive board of LPD?	
14	MR. TEMKO: Object. Vague and	
15	ambiguous. 11:16AM	
16	THE WITNESS: (Interpreted) To be	
17	more exact, if such proposal was made by LPD,	
18	I think such was approved by us in that way.	
19	BY MR. SILBERFELD:	
20	Q All right, so 11:17AM	
21	MR. HWANG: Sorry, he added	
22	something.	
23	THE WITNESS: (Interpreted) And that	
24	was such approval was made by of SVB.	
25		
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1	You testified earlier today, in		
2	response to counsel's question, about LG's decision		
3	to make a second capital injection into LPD in June		
4	of 2004.		
5	Do you recall that?	06:31PM	
6	Yeah. That was the second capital		
7	injection. Yes, I recall.		
8	And just so we orient ourselves. If		
9	you'd look at Exhibit 7501, which is the reference		
10	(materials? (It looks like this.) ((Indicating))	06:31PM	
11	A Yes.		
12	Q Just look with me, if you would, at		
13	page 14 of 14. So I'm referring to the third item		
14	down, "LGEI made a \$250 million capital injection".		
15	Do you see that?	06:32PM	
16	A Yes, I do.		
17	Q And is it your testimony that you		
18	believe that LGEI made that second capital		
19	injection on or about June 25, 2004?		
20	A Yes.	06:32PM	
21	When was the decision made by LGEI to		
22	make that second capital injection?		
23	A I don't recall exact the exact		
24	date, but definitely there has been discussion in		
25	2003 because they were talking they were	06:33PM	

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1	zero, is that correct?		
2	A Yes.		
3	Q Mr. Na, you testified, in response to		
4	counsel's questioning earlier, that you served on		
5	the supervisory board of LPD from approximately	06:35PM	
6	late 2003 to late 2005.		
7	Do you recall that testimony?		
8	A Yes, I do.		
9	Q And I believe you test testified		
10	that you also attended at least one prior	06:35PM	
11	supervisory board meeting as a guest, correct?		
12	A Yes, just once.		
13	Q At any of the supervisory board		
14	meetings that you attended, either as a member or		
15	as a guest, did you ever hear any reference to the	06:35PM	
16	fact that LPD had been meeting with its competitors		
17	to exchange pricing, capacity or production		
18	information?		
19	No, nobody was telling about that to		
20	<mark>me</mark> .	06:36PM	
21	Q Did you ever hear from anyone at LPD		
22	that LPD had been meeting with competitors to		
23	exchange pricing, capacity or production		
24	information?		
25	A No.	06:36PM	

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		\top
1	In your role as the head of IR and	
2	M&A at LGEI, did you ever hear that LPD had been	
3	meeting with its competitors to exchange pricing,	
4	capacity or production information?	
5	A No. 06:36PM	
6	Q And this I may be beating the dead	
7	horse. Let me ask it one other way.	
8	After the formation of LPD in June of	
9	2001, did you ever hear from anyone at LG that they	
10	knew or suspected that LPD had been meeting with 06:37PM	
11	competitors to exchange pricing, capacity or	
12	production information?	
13	A No.	
14	Q Now, I just want to ask you a couple	
15	of questions about the period before the formation 06:37PM	
16	of LPD, and I'm focusing on I believe the time	
17	period was 1998 to 2001 when you were working in	
18	the United States.	
19	Do you recall that time frame?	
20	A Yes, it was tough times to me. 06:37PM	
21	Q I believe you testified that, during	
22	those years, you were working as the brand manager	
23	for the IT brand for LGEUSA, is that correct?	
24	A For the IT products.	
25	Q IT products. So you were selling IT 06:38PM	
	Page 266	

1	CERTIFICATE
2	
3	I, THELMA HARRIES, MBIVR, ACR do hereby
4	certify:
5	That YOUNG BAE NA the witness whose
6	examination is hereinbefore set forth was duly
7	sworn by me and the within transcript is a true
8	record of the testimony given by such witness.
9	I further certify that I am not related to
10	any of the parties of this action nor in anyway
11	interested in the outcome of this matter.
12	
13	
	THELMA HARRIES, MBIVR, ACR
14	Certified Court Reporter
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EXHIBIT 24 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS

EXHIBIT 24 TO HARTGE DECLARATION ISO LG ELECTRONICS, INC.'S PARTIAL MSJ ON WITHDRAWAL GROUNDS

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PAGE (

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Topic No. 1: Ownership Structure of Particular Entities During Relevant Periods

LGEUSA	March 1 1005 property I CEI has averaged a projective interest in	Courses I CEL Annual
LGEUSA	March 1, 1995 – present: LGEI has owned a majority interest in	Source: LGEI Annual
	LGEUSA.	Reports
	D 1 - 74 4000 1051 11 00 700 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	December 31, 1998: LGEI held a 99.7% interest in LGEUSA.	,
	5	
	Beginning December 31, 1999 – present: LGEUSA has been a	
	wholly-owned subsidiary of LGEI.	
Zenith	March 1, 1995 – Nov. 8, 1995: LGEI held an approximately 5%	Source: Securities
	ownership share in Zenith.	and Exchange
		Commission filings
	Beginning November 8, 1995 – April 27, 1999: LGEI and LG	
	Semicon Co., LTD, held an approximately 57.68% ownership	
,	interest in Zenith. Of this 57.68% ownership share, LG Semicon	
	held an 80% share and LGEI held a 20% share.	
	Beginning April 27, 1999 - November 5, 1999: LGEI held its	
	57.68% ownership interest in Zenith directly.	
	Beginning November 5, 1999 – 2004: Zenith emerged from a	
	bankruptcy restructuring as a wholly owned subsidiary of LGEI.	•
	2004 - Present: Zenith is a wholly owned subsidiary of LGEUSA.	
LG Semicon	November 8, 1995 – April 27, 1999: LG Semicon Co., LTD is a	Source: Data
Co., LTD	wholly owned subsidiary of LGEI.	Compiled By LGEI
,	,	Legal Department
LPD	June 26, 2001 (date of formation): LGEI and LG Electronics	Source: Data
	Wales Ltd. collectively held a 50% minus one share interest.	Compiled By LGEI
	LGEI held a 37.5% ownership interest and LG Electronics Wales	Legal Department
	Ltd. held a 12.5% interest.	regar pebartitienr
+	eta, nera a 12.3% merest.	,
	Beginning April 15, 2003: LGEI and LG Electronics Wales Ltd.	
•	continued to hold a 50% minus one share interest in LPD.	
	Between the two companies, LGEI held a 40.8% interest and LG	
	Electronics Wales Ltd. held a 9.2% interest.	'
	Liectrofies Wales Liu, field a 3.2% lifterest.	
	Beginning May 1, 2004 – LPD bankruptcy: LG Electronics Wales	
**************************************	Ltd. held a 50% minus one share interest.	



Topic No. 2: LPD Board Members, Officers, and Group Members

Chart A: LPD Supervisory Board Members [By Name]

	(end Accession and College
	Timacon,	
	Sine Clouds Bright	
Guy Demuynck	10/27/2001 – 12/2/2002	KPNV
Frans Spaargaren	10/27/2001 – 2/24/2004	KPNV
David Chang	10/27/2001 – 9/16/2003	KPNV
Nam K. Woo	12/2/2002 11/4/2003	LGEI
	and 9/3/2004 ~ 11/24/2004	
Byung Chul Jung	10/27/2001 - 11/5/2002	LGEI
Young Soo	10/27/2001 – 1/12/2006	LGEI
Kwon		
Jan Oosterveld	12/2/2002 - 2/24/2004	KPNV
John Koo	12/2/2002 - 9/16/2003	LGEI
Woo Hyun Paik	12/2/2002 - 2/24/2004	LGEI
Ken Humphreys	2/18/2003 - 2/24/2004	KPNV
Young Bae Na	12/2/2003 - 11/28/2005	LGEI
Frans A. van	9/3/2004	KPNV
Houten		,
Ad Huijser	9/3/2004 – 1/12/2006	KPNV
Herman olde	9/3/2004 - 1/12/2006	KPNV
Bolhaar		
Martin McHugh	11/24/2004 - 1/12/2006	KPNV
Hee Won Kwon	2/18/2005 - 1/12/2006	LGEI
S.H. Park	1/12/2006	LGEI

¹ Approximate dates of tenure are based on the dates on which these board members appear on the LPD Supervisory Board minutes in the possession, custody, or control of LGEI.

Chart B: Employment Background of Supervisory Board Members Appointed By LGEI

	Byung Chul Jung	
Date	Division	Position
2000/01/01	General Management of Head Office	President
1999/01/01	General Management	President
1996/12/10	CEO/CFO	Vice President
1996/07/01	CFO	Vice President
	Nam K. Woo	
Date	Division	Position
2006/01/01	General Management of China Region	President
2005/01/01	Training Dispatch	President
2000/02/01	Digital Media Business Office	Vice President
2000/01/01	Multimedia Business Office	Executive Director
1996/11/01	Dept. of Management Strategy	Executive Director
1996/07/04	North America Region Office	Executive Director
1995/03/01	LGEUSA	Executive Director
	Young Soo Kwon	2007-1110
Date	Division	Position
2002/04/01	Finance and Economy	President
2001/01/01	Finance and Economy Team	Managing Director
2000/01/01	Finance	Managing Director
1999/07/01	Management Support	Assistant Managing Director
1998/09/21	M&A Promotion Task Team	Assistant Managing Director
1996/12/10	Globalization	Director
1996/07/04	Strategic Planning	Senior General Manager
1996/04/23 -	CD-PLAYEROBU	Senior General Manager
1995/01/01	CD-PLAYEROBU	General Manager
	John Koo	
Date	Division	Position
2003/10/01	Counsel Office	Chairman
1996/03/01	LGE CEO and Electronic Media CU	Vice Chairman
1995/01/01	LGE CEO	Chairman
•	Woo Hyun Paik	
Date	Division	Position
2008/01/01	CTO	President
2005/01/01	CTA	President
2000/07/01	North America; CTO	President
2000/02/01	North America; CTO	Vice President
1998/02/01	CTO (Multimedia)	Vice President
	Young Bae Na	
Date	Division	Position
2004/01/01	IR/M&A Team	VPGM
2002/03/01	IR/M&A Team	General Manger
2001/09/02	M&A Group	General Manager
1999/01/01	LGEUSA Brand	General Manager
1998/04/01	LGEUSA	General Manager
1996/03/01	Office of the Chairman	General Manager

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	Hee Won Kwon			
Date	Division	Position		
2007/06/01	LCD TV Business Dept.	Vice President		
2007/03/01	Display Production	Vice President		
2005/01/01	Display Business Dept.	Vice President		
2002/01/01	Digital Information Display Business Dept.	Managing Director		
2001/07/01	DID Production	Managing Director		
2000/01/01	PC Production	Managing Director		
1998/01/01	PC Production Office	Senior General Manager		
1997/01/11	PC Planning Management Team	General Manager		
1996/08/14	Renovation Team 2	General Manager		
1996/07/23	Europe region Planning Management Team	General Manager		
1996/02/23	The Western region Planning Management Office	General Manager		
1995/03/23	Paris Branch	General Manager		
1995/01/24	Overseas Business Soft Landing Team	General Manager		
1995/01/23	Solution Development Office	General Manager		

Seong (or Sung) Ho Park			
Date Division Position			
2007/04/01	IR Team	Vice President	
2006/01/01	IR/M&A Team	Vice President	

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Chart C: LPD Board of Management Members

Nanyar XX	a paragita a	""""""""""""""""""""""""""""""""""""""	. Le containe
or many columns to the last to the last the last to th		- Timux outkaulid	
	Aug and Company	(mark Warapenga,	
Philippe Combes	LPD	6/29/2001 - 8/16/2001	KPNV
Kyoung Ji Lee	LPD	6/29/2001 - 2/5/2002	LGEI
Sang Ho Sagong	LPD	6/29/2001 - 6/12/2002	LGEI
Ki Song Cho	LPD	6/29/2001 - 12/31/2001	LGEI
Andreas Wente	LPD	9/15/2001 - 4/1/2004	KPNV
James (Jim) Smith	LPD ·	6/12/2002 - 4/1/2004	KPNV
Aart Van Gorkum	LPD	6/12/2002 - 4/30/2003	KPNV
Sang Yeoup Rhee	LPD	6/12/2002 - 1/1/2003	LGEI
Deok Sik Moon	LPD	6/12/2002 - 1/1/2003	LGEI
Moon Bong Choi	LPD	1/1/2003 - 10/24/2005	LGEI
Byong-chul Kang	LPD	1/1/2003 - 4/1/2005	LGEI
Bernard Cassanhiol	LPD	4/30/2003 - 1/15/2005	KPNV
Jeong Il Son	LPD ·	12/31/2002 - 3/7/2006	LGEI
Petrus van Bommel	LPD	4/1/2004 - 8/1/2005	KPNV
Cornelius van Otterloo	LPD	1/15/2005 - 10/24/2005	KPNV
Joung-Won Ha	LPD	4/1/2005 - 10/24/2005	LGEI
Rene Nibbelke	LPD .	7/8/2005 - 10/24/2005	KPNV
Paulus Verhagen	LPD	8/1/2005 - 3/7/2006	KPNV

Chart D: LPD Board of Management Members With an Employment History At LGEI

	THE THE TRANSPORT OF THE PROPERTY OF THE PROPE	
Appointment Date	Division	Title of Position
2001/01/01	Europe Management	Vice President
1999/08/23	Financial Administration	Executive Director
1999/07/08	Overseas Physical Distribution	Managing Director
1989/08/01	Semiconductor Business Headquarter	General Manager
	Sang Ho Sagong	
Appointment Date		Title of Position
2004/01/01	DTV North Asia Group	General Manager
1999/08/10	BNL Branch	General Manager
1 99 7/04/04	Düsseldorf Office	Deputy General
		Manager
1996/07/24	CD-ROM Export Team	Deputy General
	•	Manager .
1996/07/01	CD-ROM Branch Office Support Team	Deputy General
	•	Manager
1995/11/21	R-PROJECTTAS	Deputy General
·		Manager
1995/10/23	CD-Player Support Office	Deputy General
		Manager
1995/01/23	CD-I Sales Office	Deputy General
		Manager
	Kr Song Cho	
Appointment Date	<u>Division</u>	Title of Position
2001/01/01	M-project	Executive Vice
		President
2000/07/01	Display components /international sales	Executive Vice
		President
2000/01/01	Display components /international sales	Senior managing
		director
1999/03/01	Display International sales	Senior managing
	Mark and Admir version of the Control of the Contro	director
1997/12/01	Display international sales	Managing Director
1996/11/01	North America region headquarters	Managing Director
1996/07/04	Management strategy team	Managing Director
1996/01/01	Planning team	Managing Director
1995/03/01/	Vision planning team	Managing Director
	Sang Yeoug Rhee	
Appointment Date		Intile of Pasition
2007/02/19	Management Control Team	General Manager
2007/01/01	Europe Management Control Team	General Manager
2005/01/20	Europe Management Planning Group	General Manager

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2001/11/10	IR/M&A Team	General Manager
2000/02/22	In Charge of DBF	Deputy General
	· · · · · · · · · · · · · · · · · · ·	Manager
1999/09/10	NBD Team	Deputy General
		Manager
1993/02/01	Information Center	Assistant
	Deaksik Moon	
Appoidmentaballer	Ďivision	Title of Bostoch
2002/03/31	Management Control Team	Managing Director
2001/03/01	Financial Affairs Team	Managing Director
1998/07/23	Financial Affairs Accounting Team	General Manager
1998/06/23	Financial Administration	General Manager
1998/06/22	Human Resources/ Labor and	General Manager
	Management	
1997/03/11	Human Resources Development	General Manager
1997/03/10	Training Dispatch	General Manager
1996/07/24	Chongju Accounting Team	General Manager
1995/08/23	Communication Apparatus Management	Deputy General
	Support Office	Manager
1995/01/01	Mobile Communication Planning	Manager
	Management Team	
	Moon Bang Char.	
Appointment Sate	Division	Title of Basifich
1996/07/23	Display Parts Export 2 Team	Manager
1991/09/01	Electronic Parts Export 3 Division	Assistant
	Byeone Cheol Kang	
Averati Sintent Edate	Division	Title of Bosidor
2001/04/23	M-Project	General Manager
1999/01/09	Display Technology Strategy Team	Assistant Executive
		Researcher
1997/03/01	Technology Development Institute,	Assistant Executive
	Production Technology Center	Researcher
1993/10/09	Technology Development Institute,	Senior Researcher
	Production Technology Center	
	jeonali son	
Appointment Pare	Division	Title of Position
1998/11/01	Electron Tube 20BU	Assistant Managing
,		Director
1997/03/01	Electron Tube 108U	Director .
1996/01/01	Electron Tube 10BU	General Manager
1995/01/23	Electron Tube 1 Production	General Manager

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Chart E: LPD Group Management Team Members

		- Position	en e	200.00235
11.17.7 (#10.00) (# 10.00)	energy of the second		==Misnayanaa==	
Philippe Combes	LPD	CEO	6/29/2001 -	KPNV
•			8/16/2001	
Andreas Wente	LPD	CEO	9/15/2002 -	KPNV
			9/10/2002	
Kyoung Ji Lee	LPD	CFO	6/29/2001 -	LGEI
			9/10/2002	
S. P. Koo	LPD	Deputy CEO; COO	6/29/2001 -	LGEI
			9/10/2002	
Ki Song Cho	LPD	CSO	6/29/2001 -	LGEI
			9/10/2002	
Guy Leborgne	LPD	Chief Strategy	6/29/2001 -	KPNV
		Planning Officer	9/10/2002	\
		("CSPO")	,	
Aart van Gorkum	LPD	Chief Technology	6/29/2001 -	KPNV
		Officer (CTO")	9/10/2002	
J.D. Choi	LPD	Regional Manager	6/29/2001 -	LGEI
		Asia/Pacific	4/1/2002	
Jim Smith	LPD	Regional Manager	6/29/2001 -	KPNV
		Europe	9/10/2002	
Y.Y. Park	LPD	Regional Manager	6/29/2001 -	LGEI
	·	China	9/10/2002	
Edward Schwartz	LPD	Regional Manager	6/29/2001 -	KPNV
		Americas	9/10/2002	

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Chart F: LPD Group Management Team Members With an Employment History At LGEI

Source of Information: Data Compiled By LGEI Legal Department

Kyoung Ji Lee

Appointment Date	Division	Title of Position
2001/01/01	Europe Management	Vice President
1999/08/23	Financial Administration	Executive Director
1999/07/08	Overseas Physical Distribution	Managing Director
1989/08/01	Semiconductor Business Headquarter	General Manager

S.P. Koo

Appointment Date		il inie sersitoru.
2001/01/01	Display Device business headquarters	President
1999/03/01	Display business headquarters	President
1996/07/04	Display business headquarters	Executive Vice President
1996/03/01	Video Display SBU	Executive Vice President
1995/03/01	Video Display SBU	Senior Managing Director

Ki Song Cho

Ansoniment Sale	i Bivisiki	
2001/01/01	M-project	Executive Vice President
2000/07/01	Display components /international sales	Executive Vice President
2000/01/01	Display components /international sales	Senior managing director
1999/03/01	Display International sales	Senior managing director
1997/12/01	Display international sales	Managing Director
1996/11/01	North America region headquarters	Managing Director
1996/07/04	Management strategy team	Managing Director
1996/01/01	Planning team	Managing Director
1995/03/01/	Vision planning team	Managing Director

J.D. Choi

Appointment Date: Division : Division : Title of Position			
2000/03/01	Electron Tubes Business Group	Managing Director	
1998/11/01	Electron tubes 1 OBU	Assistant Managing	
		Director	
1998/03/01	MGT/ Electronics OBU	Director	
1996/03/01	MGT/Electronics OBU	Director	
1995/01/01	MGT/Electronics OBU	Chief Head of Department	

Y. Y. Park

Appointment Date	i Dviski i i i i i i i i i i i i i i i i i i	i tide of Position (14)
2001/03/01	M-project	Executive Vice President
2001/01/01	M-project	Managing Director
1997/03/01	Monitor OBU	Director
1996/01/01	Monitor OBU	Director
1995/03/01	Electron tube 1 OBU	Director

Chart G: LPD Executive Board Members

esse de contrata	Tame	i taedover	(Date of	Designation
	TT. St. St. St. St.		i nodevnem.	
President/CEO	Philippe Combes	LPD	6/29/2001 -	KPNV
			8/16/2001	
President/CEO	- Andreas Wente	LPD	9/15/2001 -	KPNV
			4/1/2004	
President/CEO	Jeong II Son	LPD	4/1/2004 -	LGEI
			1/30/2006	•
Deputy to	Ki Song Cho	LPD	6/29/2001 -	LGEI
President/CEO		* *	12/31/2003	
Deputy	P. van Bommel	LPD	4/1/2004 -	KPNV
President/CEO			8/1/2005	
ĆFO .	Kyoung Ji Lee	LPD.	6/29/2001 -	LGEI
			9/10/2002	
CFO	P. van Bommel	LPD	9/10/2002-	KPNV
			8/1/2005	
CFO	Paulus Vergahen	LPD	8/1/2005 -	KP N V
			1/30/2006	
coo	S.P. Koo	LPD	6/29/2001 -	LGEI
			9/10/2002	
coo	Ki Song Cho	LPD	6/29/2001 -	LGEI
			12/31/2003	
coo	Jeong Il Son	LPD	12/31/2003 -	LGEI
		,	4/1/2004	
coo	S.D. Han	LPD	7/1/2005 -	LGEI ·
			1/30/2006	
CSO	Ki Song Cho	LPD	6/19/2001 -	LGEI
			9/10/2002	
CSO .	C.H. Kim	LPD	9/10/2002 -	LGEI
•			5/1/2004	
cso	Wiebo Vaartjes	LPD	5/1/2004 -	KPNV
	,		1/30/2006	

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Chart H: LPD Executive Board Members With an Employment History At LGEI

Source of Information: Data Compiled By LGEI Legal Department

Jeong II Son

Appointment Date: Division ; Jille of Position		
1998/11/01 Electron Tube 20BU Assistant Managing		Assistant Managing
		Director
1997/03/01	Electron Tube 10BU	Director
1996/01/01	Electron Tube 108U	General Manager
1995/01/23	Electron Tube 1 Production	General Manager

Ki Song Cho

Appointment Date	:Dixision	Title of Rosition	
2001/01/01	M-project	Executive Vice President	
2000/07/01	Display components /international sales	Executive Vice President	
2000/01/01	Display components /international sales	Senior managing director	
1999/03/01	Display International sales	Senior managing director	
1997/12/01	Display international sales	Managing Director	
1996/11/01	North America region headquarters	Managing Director	
1996/07/04	Management strategy team	Managing Director	
1996/01/01	Planning team	Managing Director	
1995/03/01/	Vision planning team	Managing Director	

Kyoung Ji Lee

A four S is acc			
Appoulment Date	Division	Title of Bosition	
2001/01/01 Europe Management Vice		Vice President	
1999/08/23	Financial Administration	Executive Director	
1999/07/08	Overseas Physical Distribution	Managing Director	
1989/08/01	Semiconductor Business Headquarter	General Manager	

S.P. Koo

Aurement Date	Division and the second	Tite of Position
2001/01/01	Display Device business headquarters	President
1999/03/01	Display business headquarters	President
1996/07/04	Display business headquarters Executive Vice Pre-	
1996/03/01	Video Display SBU	Executive Vice President
1995/03/01	Video Display SBU	Senior Managing Director

S.D. Han

Date	prekaling dinakan mengeberah	Title of Position
2000/07/01	Display Device Research institute	Managing Director
2000/03/01	Display Device Research institute	Assistant Managing

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		Director
1998/07/10	Display Device Research institute	Chief General Manager
1998/05/23	Display Softlanding team	Chief General Manager
1996/01/06	Video Display Zenith	General Manager
1995/01/23	Video Display International Support	General Manager

C.H. Kim

Date Title of Position			
2004/06/01	PDP Module Marketing team	Managing Director	
1997/04/23	LG Chicago office	Chief head of department	
1994/06/01	LG Chicago office	Head of department	

Topic No. 3(b): LGEI Investments in LPD From January 1, 2001 - 2006

June 2001	LGEI contributed its CRT assets to LPD pursuant to the Joint Venture Agreement. LPEI's CRT business was valued at \$3.1B at the time of transfer. LPD paid \$1.1B to LGEI for the excess value of CRT assets contributed by LGEI to LPD.	Source: Joint Venture Agreement.
May 31, 2002	LGEI made a \$125M capital injection. LGEI also provided a guarantee of \$200M on LPD's behalf to the bank syndicate that provided financing to LPD.	Source: Minutes of the Supervisory Board Meeting, February 2, 2002.
June 25, 2004	LGEI made a \$250M capital injection. LGEI reduced its guarantee to the bank syndicate to \$50M.	Source: Restructuring Agreement between LPD and the bank syndicate, dated June 25, 2004.
December 7,	LGEI informed LPD's lenders that "it [LGEI] is not able to	Source: December 7,
2005	inject further cash."	2005 letter from LGEI.

SEALED

EXHIBIT 25 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS - Filed Under Seal

SEALED EXHIBIT 26 TO CATHLEEN H. HARTGE DECLARATION IN SUPPORT OF DEFENDANT LG ELECTRONIC, INC'S NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUNDS – Filed Under Seal